UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX – PACIFIC SOUTHWEST REGION
75 Hawthorne Street
San Francisco, CA 94105-3901

MAY 04 2016

CERTIFIED MAIL: 7015 3010 0000 3883 2528
RETURN RECEIPT REQUESTED
In Reply Refer to: ENF-3-2

Mr. Luis Mendoza, Facilities Manager
PMC Direct Pack Inc.
12243 Branford Street
Sun Valley, CA 91352

Dear Mr. Mendoza:

The purpose of this letter is to transmit to you EPA's Clean Water Act (CWA) inspection report on PMC Direct Pack Inc. facility and to notify you of significant compliance concerns with the Clean Water Act. As you are aware, on December 10, 2015, EPA inspected PMC Direct Pack Inc. to determine if the facility is in compliance with the CWA and the requirements of the State of California's *NPDES General Permit for Discharges of Storm Water Associated with Industrial Activities* (Industrial General Permit or IGP, No. CAS000001; Water Quality Order No. 2014-0057-DWQ).

As described in the enclosed inspection report, EPA has identified a number of areas of concern. For example, it appears that PMC Direct Pack Inc. did not:

- Implement effective BMPs in an effort to prohibit unauthorized non-stormwater discharge from occurring at the Facility per the Permit. Specifically, we observed an unauthorized non-stormwater discharge actively occurring from the Facility at the time of the inspection.

- Implement good housekeeping practices at the Facility or established in the SWPPP to properly handle tracked materials per the Permit.

- Implement procedures for prompt preventative maintenance activities at the Facility per the Permit.

- Implement procedures for spill and leak prevention and response at the Facility per the requirements in the Permit.

If you would like to respond to the inspection report or submit any other information EPA should be aware of, please send a written response within 30 days of receipt of this letter. If you have stormwater related questions, please contact Lawrence Torres at (415) 947-4211 or via email at torres.lawrence@epa.gov.

Sincerely,

David Wampler, Chief
Clean Water Enforcement Section II

Enclosure: Inspection reports w/attachments

cc: Ejigu Solomon, LA RWQCB (via email w/enclosure)

EPA United States Environmental Protection Agency

Region 9 Enforcement Division
75 Hawthorne Street
San Francisco, CA 94105

INSPECTION REPORT

Inspection Date:	12/10/2015		
Time:	**Entry:** 8:25 a.m.	**Exit:** 11:30 a.m.	
Media:	Water		
Regulatory Program:	CWA NPDES/Industrial Storm Water		
Company Name:	Direct Pack, Inc.		
Facility or Site Name:	PMC Direct Pack, Inc.		
Facility/Site Physical Location:	12243 Branford Street		
(city, state, zip code)	Sun Valley, CA 91352		
Geographic Coordinates:	34°15'4.54"N, 118°24'2.09"W		
Facility/Site Contact:	Luis Mendoza	Facilities Manager	
	818-896-1101		
County:	Los Angeles County		
Facility/Site Identifier:	CA WDID#: 4 19I25619		
NPDES Number:	CAS000001		
SWRCB Order Number:	2014-0057-DWQ		
SIC Code:	3081 – Unsupported Plastics Film and Sheet		
Facility/Site Personnel Participating in Inspection:			
Luis Mendoza	Facilities Manager		818-896-1101
Mr. Patrick Ahuero	Plant Manager		Not provided
Inspector(s):			
Kettie Holland (Lead & Report Author)	PG Environmental, LLC	US EPA Contract Inspector	303-279-1778
Signature: Kettie F. Holland		Date: 1/22/16	
Lawrence Torres	US EPA Region 9 Mail Code Enf-3-2	Inspector	415-947-4211
Supervisor Review:			
Signature: David Wampler		Date: 4/20/2016	

SECTION I – INTRODUCTION

Purpose of the Inspection

On December 10, 2015, I, Kettie Holland, a U.S. Environmental Protection Agency (EPA) Contract Inspector and EPA Storm Water Enforcement Program staff, Lawrence Torres, EPA Inspector, (hereafter, we or Inspection Team) conducted an industrial storm water inspection of the Direct Pack, Inc. – PMC Direct Pack, Inc. facility (Facility or Discharger).The purpose of the inspection was to determine compliance with the requirements of the *California State Water Resources Control Board (SWRCB) Order No. 2014-0057-DWQ, National Pollutant Discharge Elimination System (NPDES), General Permit No. CAS000001* for Discharges of Storm Water Associated with Industrial Activities (the Permit). The unannounced inspection consisted of two parts, a records review and a general Facility walk-through.

Opening Conference

Upon arriving at the Facility at 8:25 a.m. on December 10, 2015, we entered the Facility's administrative building. We introduced ourselves to the Administrative Assistant, presented our credentials, and explained the purpose of the inspection. The Facility Administrative Assistant promptly contacted Mr. Luis Mendoza (Facilities Manager, PMC Direct Pack, Inc.), who greeted us at the administrative building. We introduced ourselves and presented our credential to the Facilities Manager, and explained the purpose of the inspection. We then proceeded to Mr. Mendoza's office at another area of the Facility. Here, we asked general questions regarding the Facility's operations and reviewed Permit-related documents maintained at the Facility.

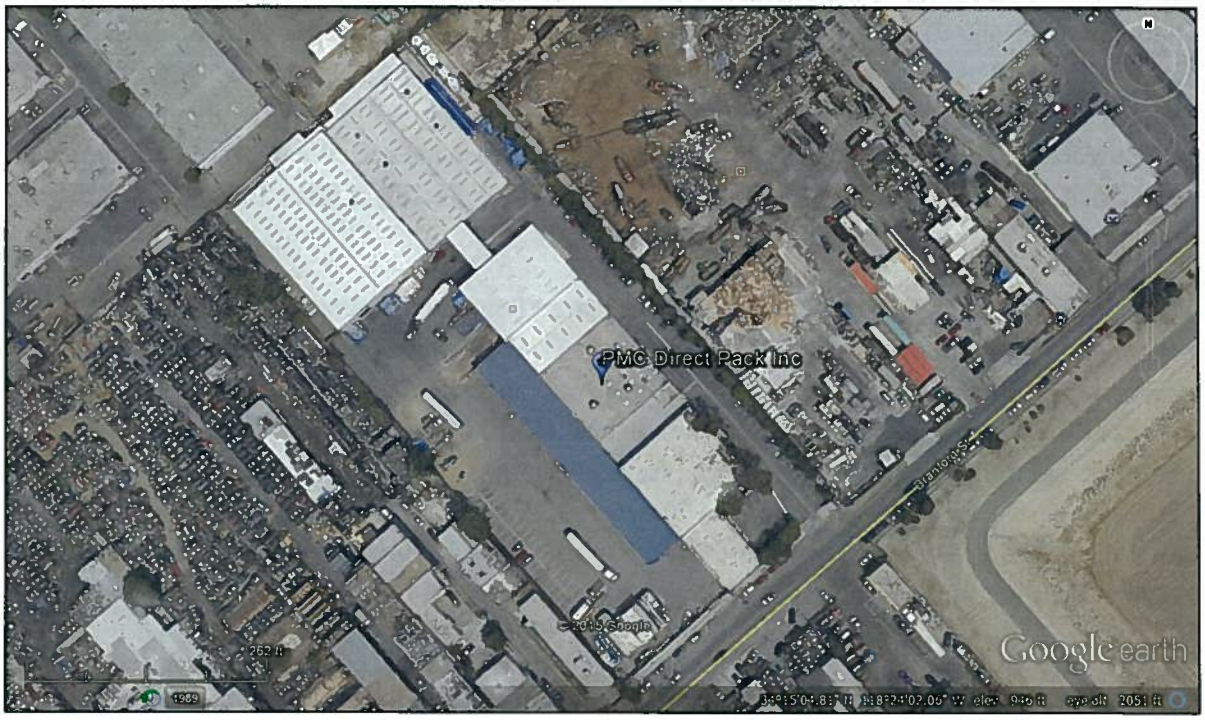
Facility/Site Description

The Direct Pack, Inc. – PMC Direct Pack, Inc. Facility is an approximately 4-acre site with two entrances onto Branford Street, located at the southern area of the Facility. The Facility consists of an administrative building, parking areas, a large production building, a warehouse, loading and unloading dock, and multiple covered storage areas. Refer to the *Google Earth* imagery below (Image A).

The surrounding businesses to the east and west are metals recycling facilities. The Discharger manufactures product plastic packaging. The Facility receives raw materials including plastic pellets and flakes and conducts thermoforming and extruding operations to produce the various plastic packaging products. These manufacturing operations are primarily conducted indoors. During the inspection we observed several outdoor material storage areas and that the Facility's silos used for storing plastic pellets are located at the northeastern corner of the Facility. The property is primarily impervious. The Facility has two storm water discharge locations onto Branford Street, at the southern perimeter of the Facility. One storm water discharge point (referred to as the Southeast Discharge Point) is located at the southeastern corner of the Facility

(Photograph 2). An additional storm water discharge point (referred to as the South Discharge Point) is located at the southern area of the Facility (Photograph 1). A third storm water discharge point (referred to as the Northwest Discharge Point) is located at the northwestern corner of the Facility (Photograph 15).

Image A: Google Earth image of Facility
12243 Branford Street, Sun Valley, CA 91352



SECTION II – OBSERVATIONS

Following the opening conference, we continued our review of the Facility's Permit-required records. Specifically, we requested and reviewed the Storm Water Pollution Prevention Plan (SWPPP), Monitoring Implementation Plan (MIP), and sample kit. We also reviewed storm water monitoring data collected from the three discharge points (i.e., Southeast Discharge Point, South Discharge Point, and Northwest Discharge Point) at the Facility. The monitoring data was collected on September 15, 2015. Mr. Mendoza stated that he had been trying for the past few months to upload the monitoring data onto the California State Water Resources Control Board (SWRCB) Storm Water Multiple Application and Report Tracking System (SMARTS) but was experiencing technical difficulty. He mentioned that he had been working with representatives from the SWRCB on fixing the issue and uploading the monitoring data but had not yet been successful. We obtained a copy of the monitoring data while onsite. Refer to the Exhibit Log appendix of this report for additional information.

Mr. Mendoza then escorted us for the Facility walk-through. We observed the South Discharge Point at the southern corner of the Facility (Photograph 1). We observed construction operations taking place near the South Discharge Point at the time of the inspection. Mr. Mendoza explained that prior to the inspection a vehicle crashed into the containment wall at the southern area of the Facility and that the wall and sidewalk were being repaired (Photograph 29). We observed pooling water at the South Discharge Point and a storm water cross path that led from the northwestern corner of the Facility, along the western perimeter, to the South Discharge Point (Photographs 1 and 7). We also observed uncovered materials, equipment, garbage bins, and exposed plastic flakes in the western area of the Facility (Photographs 3 through 8, and 12 through 14). We then proceeded to inspect the northwestern corner of the Facility and the northern area of the Facility where the plastic pellet silos are located. We observed accumulated plastic pellets on the impervious surface and outside of the Facility's fence line at the northern corner of the Facility (Photographs 17, 18, and 28).

We then observed the Facility's Northwest Discharge Point and observed staining on the pavement in this area of the Facility (Photograph 15). We then inspected the inside of the production facility and proceeded to the northeastern perimeter of the Facility where we observed wash water flowing and collecting in a sump (Photographs 19 through 21). We observed that the wash water was pumped from the sump and conveyed via pipe to the Facility's Southeast Discharge Point (Photographs 22 and 23). We observed an unauthorized non-storm water discharge (NSWD) occurring from the Facility onto the curb and gutter line on Branford Street at the time of the inspection (Photographs 24 through 27).

The majority of the process operations occur inside the production building. We observed several outdoor storage areas for industrial materials and activities. We observed that storm water that falls in the central area of the Facility would likely flow toward the southern corner of the Facility and discharge from the South Discharge Point onto Branford Street. We also observed that storm water that falls in the northwestern area of the Facility would discharge from the Northwest Discharge Point onto a neighboring property. Finally, storm water that falls in the northern or eastern portions of the Facility would likely collect in the Facility's sump and would be pumped to the Southeast Discharge Location.

SWPPP Implementation – Minimum Required BMPs (Section X.H.1)

	Yes/No	Comments
Good Housekeeping	**No**	We observed exposed plastic flakes that were uncovered and uncontained on the impervious surface of the Facility that could be mobilized during a storm event (Photographs 3 through 7).
	No	We observed oil staining on the impervious surface at

Preventative maintenance		the southeastern and southern areas of the Facility (Photographs 9 and 10).
Spill response	**No**	We observed uncovered and uncontained 55-gallon drums of emulsion chemicals at the northwestern perimeter of the Facility (Photograph 11).
Material handling and waste management	**No**	We observed uncovered and uncontained garbage bins at the southcentral area of the Facility (Photograph 8).
Erosion and sediment controls	**Not Applicable (NA)**	
Employee Training	**Yes**	
Quality assurance and recordkeeping	**No**	We observed that the Discharger did not maintain the monthly inspection records onsite at the time of the inspection.

SWPPP Implementation – Advanced Minimum Required BMPs (Section X.H.2)

	Yes/No	Comments
Advanced BMPs implemented at facility?	**Yes**	We observed an infiltration swale BMP along the eastern perimeter of the Facility. However, we also observed that the Facility's exposure minimization BMPs were not being effectively utilized at the time of the inspection.
Exposure minimization BMPs	**No**	We observed shelters installed at the Facility for the storage of various materials and processes. However, we observed uncovered equipment stored at the southern corner of the Facility, upgradient of the South Discharge Point, which was inactive at the time of the inspection (Photograph 14). We also observed exposed plastic pellets and flakes near the western perimeter and at the northern corner of the Facility (Photographs 3 through 7 and 17, 18, and 28).
Containment and discharge reduction BMPs	**Yes**	
Treatment Control BMPs	**NA**	

Other advanced BMPs	**NA**	

STORM WATER POLLUTION PREVENTION PLAN REVIEW

General Permit Section

	Yes/No	Comments
Signed Certification	**Yes**	
Pollution Prevention Team	**Yes**	
Existing Facility Plans	**Yes**	

Site Map(s) Section X.E

	Yes/No	Comments
Facility boundaries	**No**	We observed that the Facility site map shows a chain-linked fence around the perimeter of the Facility but does not specifically identify this as the Facility boundary.
Drainage areas	**No**	We observed that the drainage areas at the Facility were not identified on the Facility site map.
Direction of flow	**Yes**	
On-facility water bodies	**NA**	
Areas of soil erosion	**NA**	
Nearby water bodies	**NA**	
Municipal storm drain inlets	**Yes**	We observed that the Facility has a sump located near the northeastern perimeter of the Facility, south of the plastic pellet storage silos. We observed that the Facility site map depicts the sump as a "storm water drain" which was inconsistent with the Facility conditions we observed at the time of the inspection.
Points of discharge	**Yes**	
	Yes	

Sampling locations		
Structural control measures	**No**	We observed a storm water cross path that ran along the western perimeter of the Facility, a portion of which discharged to the Facility's South Discharge Point (Photographs 3 and 4, 7, and 16). The other portion of the storm water cross path discharged to the Northwest Discharge Point (Photograph 15). The storm water cross path was not identified on the Facility site map.
Impervious areas	**Yes**	
Location of directly exposed materials	**No**	We observed that the Discharger identified storage areas on the Facility site map but did not specifically identify these areas as location where directly exposed materials were stored. We observed several locations with directly exposed materials during the inspection.
Locations of significant leaks and spills	**NA**	
Areas of industrial activity	**No**	We observed that the Discharger identified several areas where we identified industrial activities taking place. Although these locations are depicted on the Facility site map, they are not specifically identified as areas in which industrial activity occur.
Storage areas / storage tanks	**Yes**	
Shipping and receiving areas	**Yes**	
Fueling areas	**No**	We observed a propane tank located at the southern area of the Facility. We observed that the Discharger depicted a storage area in this location on the Facility site map but did not specifically identify this location as a fueling area (Photograph 10).
Vehicle and equipment storage/maintenance areas	**Yes**	
Material handling/processing areas	**No**	We observed various areas where material handling and processing occurs at the Facility. The Discharger depicted these areas on the Facility site map but did not specifically identify them as material handling/processing areas.
Waste treatment/disposal areas	**Yes**	
Dust or particulate generation areas	**NA**	
Cleaning and material reuse areas	**No**	We observed mat cleaning occurring at the northeastern perimeter of the Facility, east of the

		production building. We observed soapy water being generated from the cleaning activity and collecting within a sump. The Discharger did not identify this area as a cleaning area on the Facility site map.
Other areas of industrial activities	**NA**	

List of Industrial Materials (Section X.F)

	Quantity handled / per *X* *(i.e. frequency)*	**Comments**
Industrial Material(s) / Storage Location	**Yes**	Plastic in resin silos (north) Plastic flakes (North and south wall production building, southwest of production building)
Industrial Material(s) / Shipping & Receiving Location	**No**	The Discharger does not list the shipping and receiving areas of the plastic pellets and plastic flakes in the SWPPP.
Industrial Material(s) / Handling Location	**Yes**	Plastic in resin silos (400,000 pounds) Plastic flakes (250,000 pounds)

Potential Pollution Sources (Section X.G.1)

	Yes/No	**Comments**
Industrial processes	**No**	We observed that the SWPPP includes information regarding potential pollutants from industrial sources. However, the Discharger did not include cleaning in the list of industrial processes and potential pollutants. We observed an active unauthorized NSWD of cleaning waters occur at the Facility during the inspection.
Material handling and storage areas	**No**	We observed that the SWPPP does not include all of the required information for potential pollutant sources at locations of material handling and storage at the Facility, per the Permit.
Dust and particulate generating activities	**NA**	
Significant leaks and spills	**Yes**	
Non-storm water discharges	**No**	We observed that the Discharger did not include all

		of the required information regarding unauthorized NSWD in the SWPPP as required by the Permit. We observed an unauthorized NSWD at the time of the inspection (Photographs 19 through 27).
Erodible surfaces	**NA**	

Assessment of Potential Pollutant Sources (Section X.G.2)

	Yes/No	Comments
Narrative assessment of likely sources of pollutants	**Not reviewed (NR)**	
Narrative assessment of likely pollutants present in storm water discharges	**NR**	
Identification of additional BMPs	**NA**	
Identification of drainage areas with no exposure	**NA**	
Identification of additional parameters	**NA**	

Monitoring Implementation Plan (Section X.I)

	Yes/No	Comments
Team Members assigned to conduct the monitoring	**Yes**	
Summary of visual observation procedures and locations	**Yes**	
Justification if applicable for: alt discharge locations; representative sampling reduction; or qualified combined samples	**NA**	
Procedures for field instrument calibration	**NA**	

Example of chain of custody	**Yes**	

Special Requirements – Plastic Materials (Section XVIII)

	Yes/No	Comments
Containment systems or alternate BMPs	**No**	We observed that the Facility had not fully implemented a containment system or all alternate BMPs to address the applicable requirements in the Permit relating to plastics facilities.
Durable sealed containers at loading / unloading / transfer/ storage areas	**No**	We observed piles of exposed plastic flakes in the storm water cross path at the western perimeter of the Facility in the Facility's plastic flake storage area.
Form of secondary containment at loading / unloading / transfer / storage areas	**No**	We observed evidence of a release of plastic pellets at the northern corner of the Facility, in the vicinity of the silos used for plastic pellet storage. We observed that the Facility did not use secondary containment equipment or a process for containing plastic pellets in areas of the Facility where plastic pellets were loaded/unloaded, transferred, or stored.
Vacuum system(s) available?	**Yes**	
Containment system or alternative for plastics materials < 1mm in size	**No**	We observed that the Discharger had installed a mesh screen in the sump at the northeastern perimeter of the Facility (Photograph 20). We also observed that the Discharger had not implemented a containment system designed to trap the plastic particles at the Southeast Discharge Point or the South Discharge Point (Photographs 1 and 2).

SECTION III – AREAS OF CONCERN

We held a closing conference at the conclusion of the inspection. During the closing conference, we reviewed the preliminary inspection observations and areas of concern with Mr. Mendoza and his supervisor, Mr. Patrick Ahuero (Plant Manager – PMC Direct Pack, Inc.) The presentation of areas of concern does not constitute a form compliance determination or violation.

1. The Discharger had not implemented effective BMPs in an effort to prohibit unauthorized NSWDs from occurring at the Facility per the Permit. Specifically, we observed an unauthorized NSWD actively occurring from the Facility at the time of the inspection.

We observed floor mat cleaning occurring at the northeastern perimeter of the Facility, to the east of the production building. Soapy wash water was being generated from this process and was flowing toward and collecting within a nearby sump (Photographs 19 and 20). We observed an oily sheen on the surface of the wash water within the sump (Photograph 21). Mr. Mendoza explained that the wash water collects in the sump and that a float activated pump within the sump conveys the water via a pipe to the Facility's Southeast Discharge Point (Photograph 22). Mr. Mendoza explained that the sump was intended to be used to transport storm water to the Southeast Discharge Point. We then proceeded to the Southeast Discharge Point and observed the wash water flowing from the sump to the Southeast Discharge Point, through an unknown conveyance pipe and onto Branford Street (Photographs 23 through 27). We observed the wash water (NSWD) from the Facility accumulating in the curb and gutter line and flowing down Branford Street. Section I.C.28, Discharge Prohibitions, of the Permit, states that prohibited NSWDs are referred to as unauthorized NSWDs in the general permit. Unauthorized NSWDs may contribute significant pollutant loads to receiving waters. Measures to control sources of unauthorized NSWDs such as spills, leakage, and dumping, must be addressed through the implementation of BMPs. The Discharger had not deployed effective BMPs onsite to mitigate the potential for an unauthorized NSWD of wash water to occur at the Facility per Section I.C.28 of the Permit.

2. We observed that good housekeeping practices had not been implemented at the Facility or established in the SWPPP to properly handle tracked materials per the Permit. Specifically, we observed tracked plastic flakes near the western and central-western perimeter of the Facility, within a storm water cross path (Photographs 3 through 7). We observed the potential for the plastic flakes to be mobilized via the storm water cross path to the South Discharge Point. Section X.H.1.a.v, Good Housekeeping Minimum BMPs, of the Permit, states that the Discharger shall cover all stored industrial materials that can be readily mobilized by contact with storm water. Due to the conditions we observed onsite, the Facility had not implemented practices at the Facility or included these practices in the SWPPP per the good housekeeping and plastic containment requirements in Sections X.H.1.a.v of the Permit.

3. We observed that procedures for prompt preventative maintenance activities had not been implemented at the Facility per the Permit. Specifically, we observed oil staining on the impervious surface at the southeastern and southern areas of the Facility (Photographs 9 and 10). Section X.H.1.b.iv, Preventive Maintenance Minimum BMPs, of the Permit, states that the Discharger shall establish procedures for prompt maintenance and repair of equipment, and maintenance of systems when conditions exist that may result in the development of spills or leaks. Due to the oil staining observed at the Facility, it appeared that the Discharger had not implemented procedures for prompt maintenance and repair

of equipment at the time of the inspection as required by Section X.H.1.b.iv of the Permit.

4. We observed that procedures for spill and leak prevention and response had not been implemented at the Facility per the requirements in the Permit. Specifically, we observed two 55-gallon drums of emulsion chemicals stored at the northwestern perimeter of the Facility without overhead coverage or containment (Photograph 11). We also observed multiple 5-gallon buckets of various chemicals including a protective film coating at the southern corner of the Facility without containment or overhead coverage (Photographs 12 and 13). Section X.H.1.c.i, Spill and Leak Prevention and Response Minimum BMPs, of the Permit, states that the Discharger shall establish procedures and/or controls to minimize spills and leaks. SWPPP Section 5.B states for material handling and storage, refer to Table 4-1. Table 4-1 is not identified in the SWPPP. From the conditions we observed onsite, the Discharger was not properly implementing spill and leak prevention and response procedures as required by Section X.H.1.c.i of the Permit.

5. We observed that all materials handling and waste management BMPs had not been implemented at the Facility or addressed in the SWPPP per the Permit. Specifically, we observed two uncovered and uncontained garbage bins located in the southcentral area of the Facility (Photograph 8). Section X.H.1.d.iii, Material Handling and Waste Management Minimum BMPs, of the Permit, states that the Discharger shall cover industrial waste disposal containers and industrial material storage containers that contain industrial materials when not in use. SWPPP Section 5.G states that the trash bin is required to be in good conditions, leak proof and covered prior to and during expected rain events. We observed that the Discharger was not properly implementing the materials handling and waste management BMPs and that the SWPPP did not properly address these BMPs as required per Section X.H.1.d.iii of the Permit.

6. We observed that the Discharger had not implemented effective procedures to ensure that SWPPP-related documentation was maintained onsite in accordance with the Permit and as outlined in the SWPPP. Specifically, we observed that the Discharger did not have the monthly inspection reports available for review at the time of the inspection. Mr. Mendoza explained that the Discharger's consultant was in the process of compiling monthly inspection report forms and that the Discharger maintained the quarterly inspection reports required to be completed in the previous industrial general storm water permit (i.e., Order No. 97-03-DWQ). Section X.H.1.g.iii, Quality Assurance and Record Keeping Minimum BMPs, of the Permit, states that the Discharger shall maintain the BMP implementation records, training records, and spill and clean-up related records onsite for at least five years. SWPPP Section 10.B.3 states that the records of all storm water monitoring information and copies of all reports required by the general permit

shall be retained for a period of at least five years. Due to the conditions that we observed onsite and the lack of documentation maintained at the Facility, the Discharger was not implementing quality assurance and recordkeeping BMPs per Sections X.H.1.g.iii of the Permit or as prescribed in the SWPPP.

7. We observed that the Discharger had not effectively utilized advanced BMPs onsite to reduce or prevent discharges of pollutants in the storm water from the Facility in accordance with the Permit. Specifically, we observed several covered shelters onsite at the time of the inspection. However, we observed partially uncovered and inactive equipment stored at the southwestern perimeter of the Facility, upgradient of the South Discharge Point (Photograph 14). We also observed uncovered and uncontained 55-gallon drums of emulsion chemicals at the northwestern perimeter of the Facility (Photograph 11) and 5-gallon buckets of various chemical including a protective film chemical at the southern area of the Facility (Photographs 12 and 13). We also observed exposed plastic flakes and pellets near the western and northern perimeters of the Facility (Photographs 3 through 7 and 17, 18, and 28). Section X.H.2.a, Advanced BMPs, of the Permit, states the Discharger shall implement and maintain any advanced BMPs necessary to reduce or prevent discharges of pollutants in its storm water discharge in a manner that reflects best industry practice. We observed that the Discharger was not effectively utilizing advanced BMPs to reduce the discharge of pollutants in storm water from the Facility as required per Section X.H.2.a of the Permit.

8. We observed that the Discharger did not include all minimum information on the Facility site map per the Permit. Section X.E.3, Site Map, of the Permit, states the Discharger is required to include specific elements on the Facility site map. The following elements were not depicted on the Facility's site map provided to us at the time of the inspection:
    a. *Facility boundary.* We observed that the Facility site map includes a chain-linked fence around the Facility but is not specifically identified as the Facility boundary on the Facility's site map.
    b. *Drainage areas.* We observed that the Facility site map did not identify the drainage areas of the Facility.
    c. *Municipal storm drains.* We observed that the Facility has a sump located at the northeastern perimeter of the Facility, south of the plastic pellet storage silos. We observed that the Facility site map identifies the sump as a "storm water drain" which was inconsistent with the Facility conditions we observed at the time of the inspection. We observed that the sump was used to collect wash water and pump the water to the Facility's Southeast Discharge Point. We observed an unauthorized NSWD at this area of the Facility at the time of the inspection.

d. *Structural storm water controls.* We observed a storm water cross path that ran along the western perimeter of the Facility and conveyed storm water either to the Northwest Discharge Point or the South Discharge Point (Photographs 3 and 4, 7, 15, and 16). The storm water cross path was not identified on the Facility site map.
e. *Location of directly exposed materials.* We observed that the Discharger identified storage areas on the Facility site map but did not specifically identify these areas as location where directly exposed materials were stored. We observed several locations with directly exposed materials during the inspection. Specifically, we observed uncontained plastic flakes in the storm water cross path (Photographs 3 through 7), partially uncovered equipment (Photograph 16), and uncontained plastic pellets at the northern corner of the Facility (Photographs 17, 18, and 28).
f. *Areas of industrial activity.* We observed that the Discharger depicted the production building and areas of plastic storage on the Facility site map. However, the Discharger did not specifically identify these locations as areas where industrial activities occur.
g. *Fueling Areas.* We observed a propane tank located at the southern area of the Facility (Photograph 10). We observed that the Discharger depicted a storage area in this location on the Facility site map but did not specifically identify this location as a fueling area.
h. *Material handling/processing areas.* We observed various areas where material handling and processing occurs at the Facility. Specifically, within the production building, at the western perimeter of the Facility, and at the northern corner of the Facility. The Discharger depicted these areas on the Facility site map but did not specifically identify them as material handling/processing areas.
i. *Cleaning and material reuse areas.* We observed mat cleaning occurring at the northeastern perimeter of the Facility, to the east of the production building. We observed soapy water being generated from the cleaning activity and collecting within a sump (Photographs 19 through 22). The Discharger did not identify this area as a cleaning area on the Facility site map.

9. We observed that the Discharger did not include information in the SWPPP regarding the areas in which materials at the Facility are received or shipped, as required by the Permit. Specifically, we observed that the Discharger included a list of industrial materials in SWPPP Section 4 and included information regarding the storage location, average quantity, handling frequency, and area handled. However, it did not include areas where the industrial materials are shipped or received at the Facility. Section X.F, List of

Industrial Materials, of the Permit, states that the Discharger shall ensure that the SWPPP includes a list of industrial materials handled at the facility, and the locations where each material is stored, received, shipped, and handled, as well as the typical quantities and handling frequency. The Discharger did not include the areas where the industrial materials are shipped or received at the Facility in SWPPP Section 4 as required per Section X.F of the Permit.

10. We observed that the Discharger did not include information in the SWPPP regarding cleaning activities as an industrial process with associated potential pollutants, as required by the Permit. Specifically, we observed floor mat cleaning operations taking place at the northeastern perimeter of the Facility, to the east of the production building. We observed wash water from the cleaning process collecting in a nearby sump. The wash water was actively being pumped from the sump to the Facility's Southeast Discharge Point and was discharging offsite onto Branford Street (Photographs 19 through 27). The Discharger had not identified the mat washing operation as an industrial process with an associated pollutant source. Section X.G.1.a, Potential Pollutant Sources, of the Permit, states that the Discharger shall ensure the SWPPP describes each industrial process including: manufacturing, cleaning, maintenance, recycling, disposal, and any other activities related to the process.

11. We observed that the Discharger did not include all of the information regarding the material handling and storage areas as locations of potential pollutant sources. Specifically, SWPPP Section 5.B states that for material handling and storage areas refer to Table 4-1 and Table 5-1. Table 4-1 is not identified in the SWPPP and Table 5-1 does not include the shipping, receiving, and loading procedures as required in the Permit. Section X.G.1.b, Material Handling and Storage Areas, of the Permit, states that the Discharger shall ensure the SWPPP describes each material handling and storage area, including: the type, characteristics, and quantity of industrial material handled or stored; the shipping, receiving, and loading procedures; the spill or leak prevention and response procedures; and the areas protected by containment structures and the corresponding containment capacity. The Discharger did not include all of the information regarding the material handling and storage areas as locations of potential pollutant sources per Section X.G.1.b of the Permit.

12. We observed that the Discharger did not include all of the required information regarding NSWDs in the SWPPP as required by the Permit. Specifically, we observed that the Discharger did not include a description of how all unauthorized NSWDs have been eliminated. At the time of the inspection, we observed an unauthorized NSWD occurring from the Facility onto Branford Street (Photographs 19 through 27). The SWPPP did not include information regarding this operation which had the potential to cause an

unauthorized NSWD and did not include a description of how all unauthorized NSWDs were eliminated at the Facility. Section X.G.1.e, Non-Storm Water Discharges, of the Permit, states that the Discharger shall ensure the SWPPP includes a description of how all unauthorized NSWDs have been eliminated. The Discharger did not include this information in its SWPPP as required by Section X.G.1.e of the Permit.

13. We observed that the Discharger had not fully installed a containment system or applied all alternate BMPs to address the applicable requirements in the Permit relating to plastics facilities. Specifically, we observed that the Discharger did not use durable sealed containers at loading/unloading, transfer, or storage areas at the Facility. Specifically, we observed piles of exposed plastic flakes on the impervious surface in the storm water cross path at the plastic flake storage area at the northern perimeter of the Facility (Photographs 3 through 7). Section XVIII.A.1.c, Special Requirements – Plastic Materials, of the Permit, states that the plastics facilities shall use durable sealed containers designed not to rupture under typical loading and unloading activities at all points of plastic transfer and storage. The Discharger had not deployed such sealed containers at the storage location at the western perimeter of the Facility per Section XVIII.A.1.c of the Permit.

14. We observed that the Facility had not fully implemented a containment process or all alternate BMPs to address the applicable requirements in the Permit relating to plastics facilities. Specifically, we observed that the Discharger did not use a secondary containment method to contain plastic pellets in the northern corner of the Facility where the plastic pellet storage silos were located. We observed evidence of a release of plastic pellets and observed uncontained plastic pellets along the western side of the production building and outside of the Facility's fence line (Photographs 17, 18, and 28). Mr. Mendoza explained that the Facility did not utilize specific procedures or containment equipment for loading and unloading plastic pellets at the Facility. Section XVIII.A.1.d, Special Requirements – Plastic Materials, of the Permit, states that plastics facilities shall use capture devices as a form of secondary containment during transfers, loading, or unloading plastic materials. We observed that the Facility had not implemented procedures or utilized capture equipment to contain plastic pellets during loading and unloading processes in accordance with Section XVIII.A.1.d of the Permit.

15. We observed that the Discharger had not fully implemented a containment system at the discharge points to trap plastic material and keep it from discharging offsite. Specifically, we observed that the Discharger had not deployed containment BMPs at the South Discharge Point or the Southeast Discharge Point at the Facility. Mr. Mendoza explained that the storm water and potential plastic pieces would likely settle at the South Discharge Point and thus would not discharge from the Facility (Photograph 1). However, this could

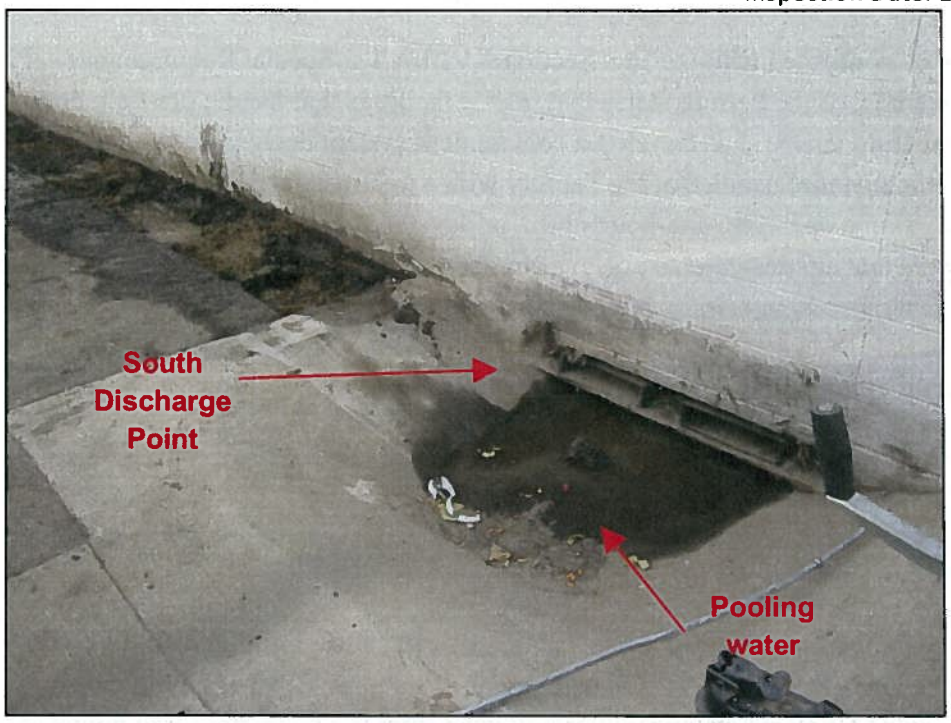
not be confirmed while onsite. Section XVIII.A.1.f, Special Requirements – Plastic Materials, of the Permit, states that plastic facilities that handle plastic materials smaller than 1mm in size shall develop a containment system designated to trap the smallest plastic material handled at the Facility with a treatment capacity of at least the peak flow rate from a one-year, one-hour storm, or develop a feasible alternative BMP or suite of BMPs that are designed to achieve similar or better performance standards. The Discharger had not deployed the appropriate BMPs onsite in an effort to trap plastic materials and keep them from discharging offsite from the South Discharge Point of the Facility per Section XVIII.A.1.f of the Permit.

SECTION IV – DOCUMENTS REQUESTED DURING INSPECTION AND ANALYTICAL RESULTS

At the time of the inspection, we requested the SWPPP, MIP, training records, monthly visual observations logs, and sample kit and equipment. While onsite we observed the analytical sampling results for storm water samples collected from the three discharge points at the Facility. The samples were collected on September 15, 2015. Mr. Mendoza stated that he experienced difficulty uploading the monitoring data to the SMARTS system. Refer to the Exhibit Log for the analytical sampling results for storm water samples collected on September 15, 2015.

SECTION V – LIST OF APPENDICES

Photograph Log
Exhibit Log



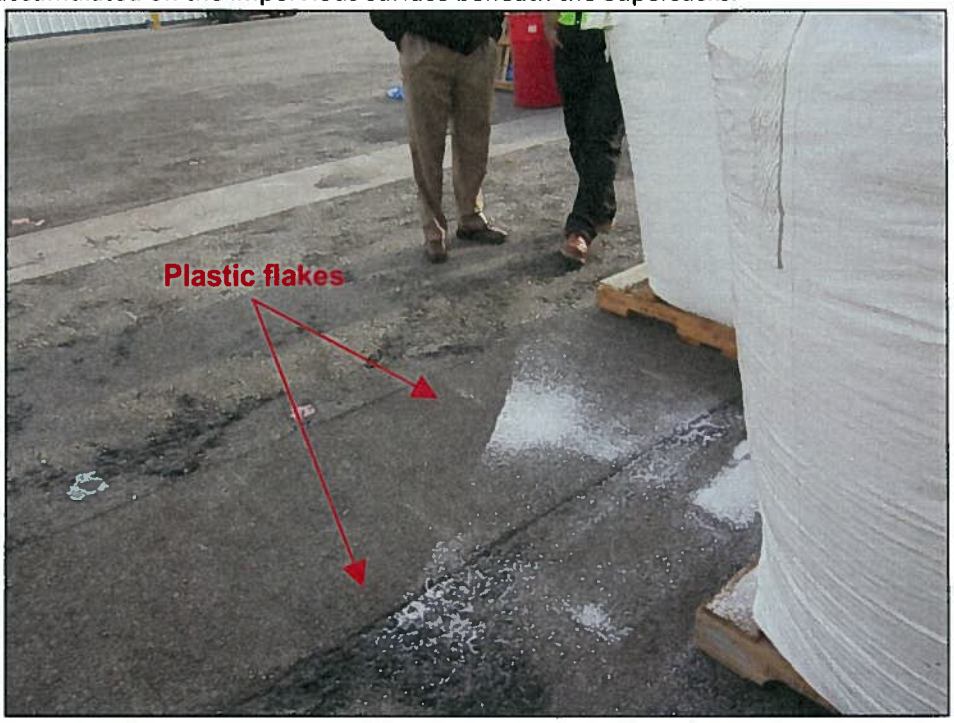
Photograph 1. View, facing south, of the South Discharge Point located at the southern area of the Facility. Note the pooling water in the discharge point.

Photograph 2. View, facing northeast, of the Facility's Southeast Discharge Point located at the southeastern corner of the Facility.

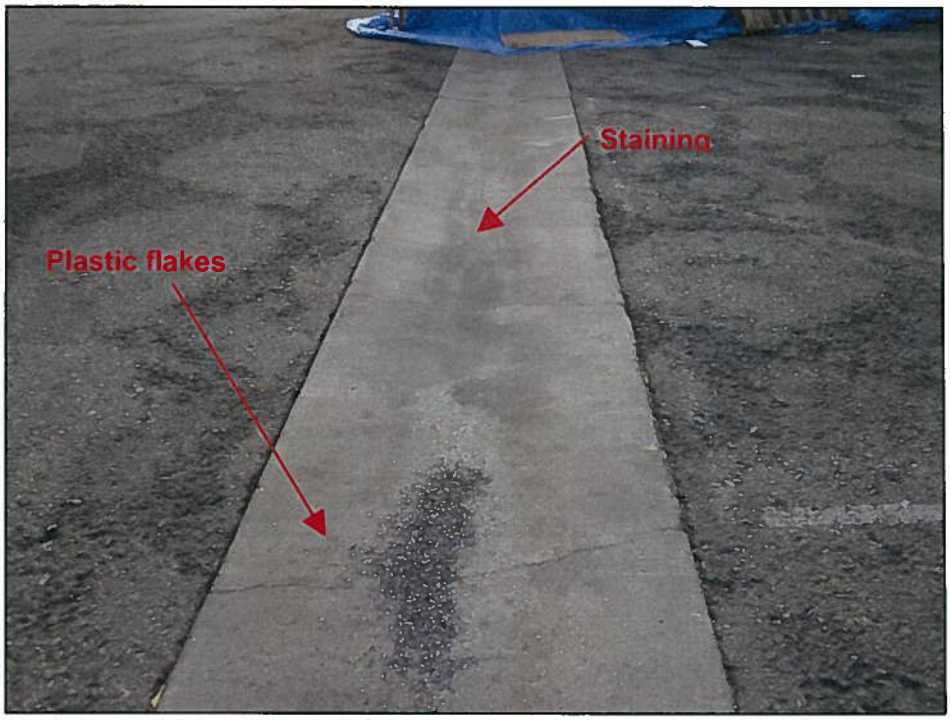
Photograph 3. View, facing southeast, of the storm water cross path. Note the plastic flakes accumulated on the impervious surface within the storm water cross path.

Photograph 4. Up-close view of the plastic flakes accumulated in the storm water cross path, depicted in Photograph 3, located near the western perimeter of the Facility.

Photograph 5. View, facing west, of uncontained Supersacks of plastic flakes. Note the plastic flakes accumulated on the impervious surface beneath the Supersacks.



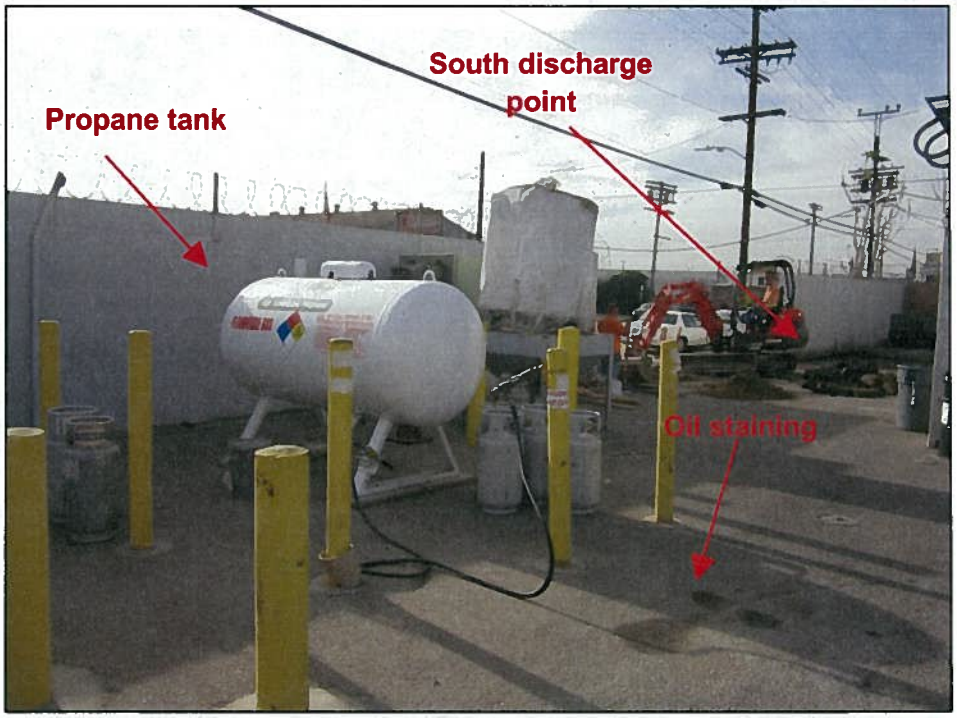
Photograph 6. Additional view of the uncontained plastic flakes accumulated on the impervious surface depicted in Photograph 5.



Photograph 7. View, facing southeast, of black plastic flakes accumulated within the storm water cross path, located near the central-western perimeter of the Facility. Note the unknown staining on the storm water cross path.

Photograph 8. View, facing north, of uncovered garbage bins located in the south-central area of the Facility.

Photograph 9. View, facing northwest, of oil staining observed on the impervious surface at the southeastern area of the Facility.



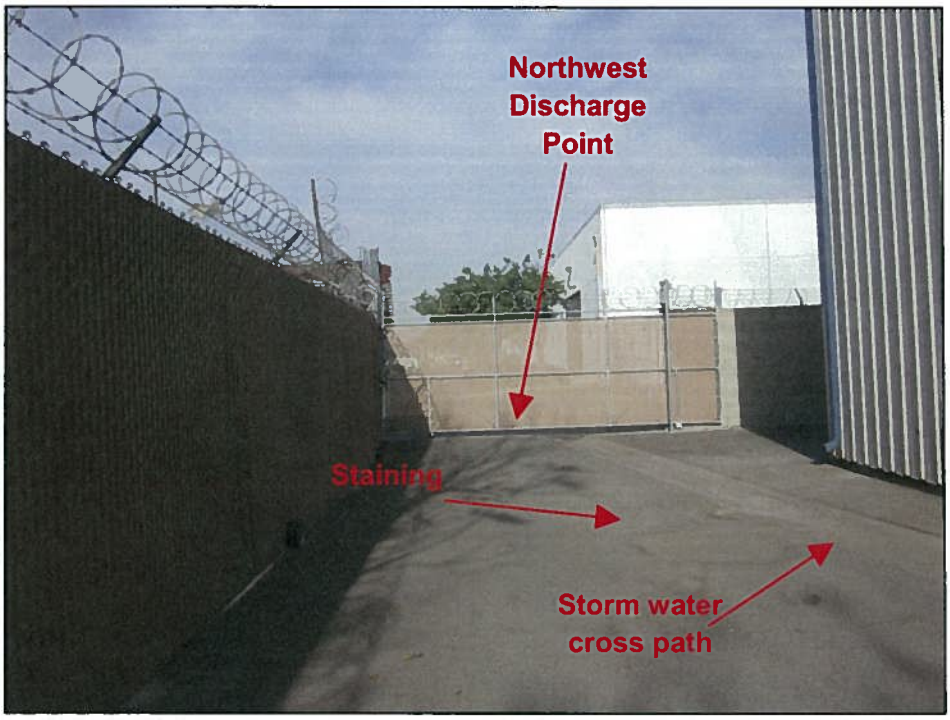
Photograph 10. View, facing southeast, of oil staining observed on the impervious surface at the southern corner of the Facility, near the propane tank, upgradient of the Facility's South Discharge Point.

Photograph 11. View, facing west, of two uncovered and uncontained 55-gallon drums of emulsion chemicals stored at the northwestern perimeter of the Facility.

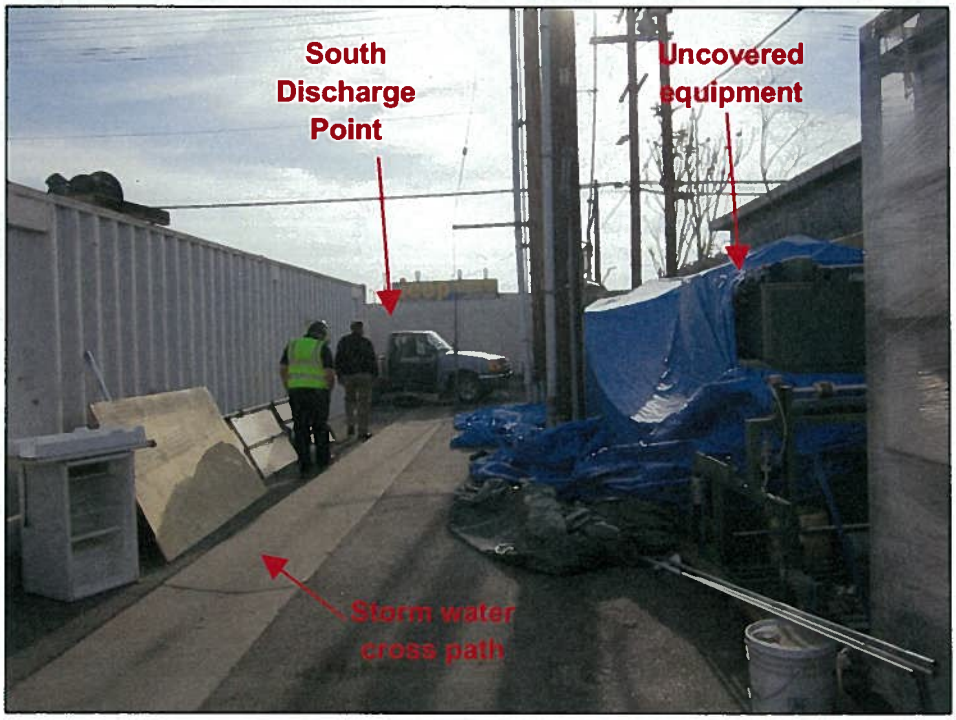
Photograph 12. View, facing south, of six uncovered and uncontained 5-gallon buckets of various chemicals, including a protective film chemical, stored at the southern corner of the Facility.

Photograph 13. Up-close view of the uncovered and uncontained 5-gallon buckets depicted in Photograph 12.

Photograph 14. View, facing south, of the partially uncovered, inactive equipment stored along the southwestern perimeter of the Facility, upgradient of the South Discharge Point.



Photograph 15. View, facing northwest, of the storm water cross path at the northwestern area of the Facility, leading to the Northwest Discharge Point at the northwestern corner of the Facility. Note the staining on the pavement.

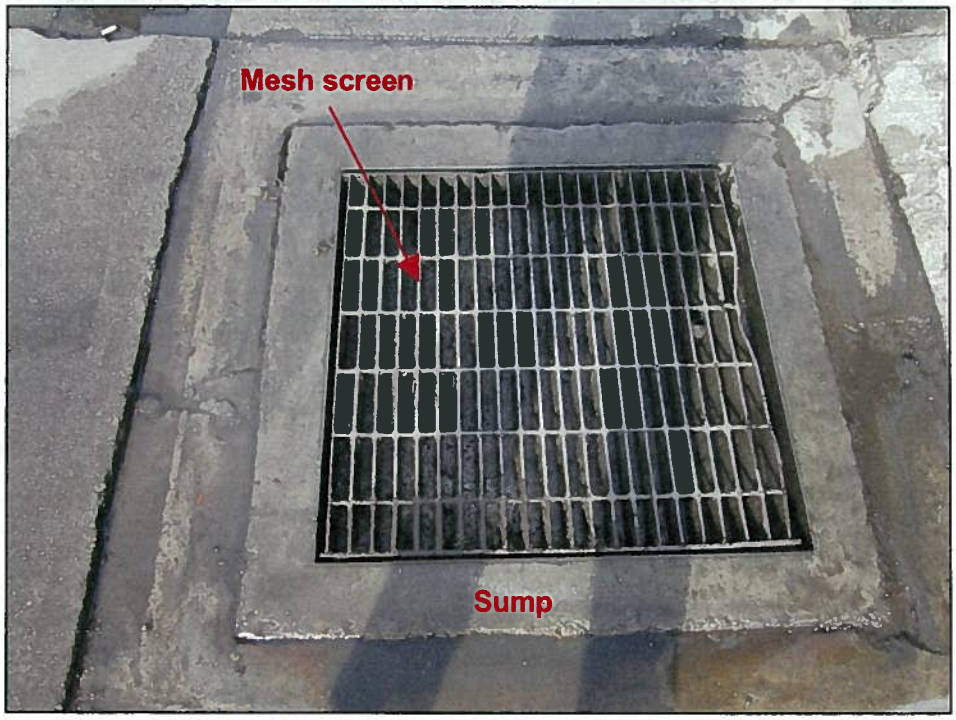


Photograph 16. View, facing southeast, of the Facility's storm water cross path that runs along the western perimeter of the Facility to the South Discharge Point.

Photograph 17. View of directly exposed plastic pellets at the northern corner of the Facility, south of the plastic storage silos.

Photograph 18. Up-close view of the directly exposed plastic pellets at the northern corner of the Facility as shown in Photograph 17.

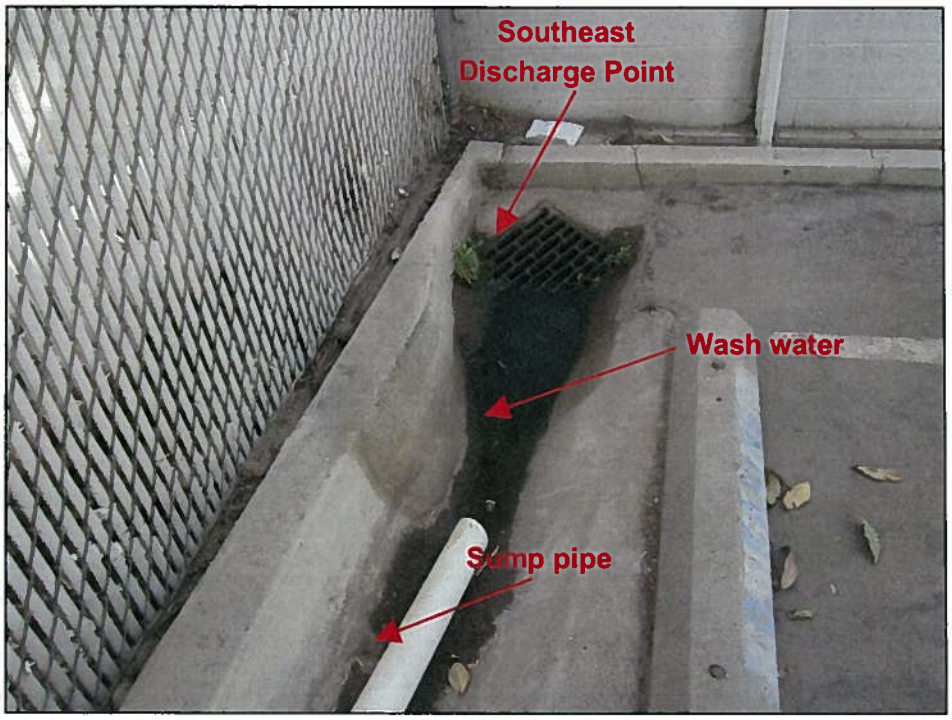
Photograph 19. View, facing northwest, of the area used for floor mat cleaning near the northeastern perimeter of the Facility. This area was not identified as a cleaning area on the Facility site map. Note the wash water collecting in the sump.



Photograph 20. Up-close view of the sump located near the northeastern perimeter of the Facility, depicted in Photograph 19. Note the mesh screen applied to the sump.

Photograph 21. Up-close view inside of the sump, depicted in Photographs 19 and 20. Note the sheen on the accumulated wash water within the sump.

Photograph 22. View, facing southeast, of the pipe that conveys water from the sump at the east-central perimeter of the Facility to the Southeast Discharge Point depicted in Photographs 2 and 23.



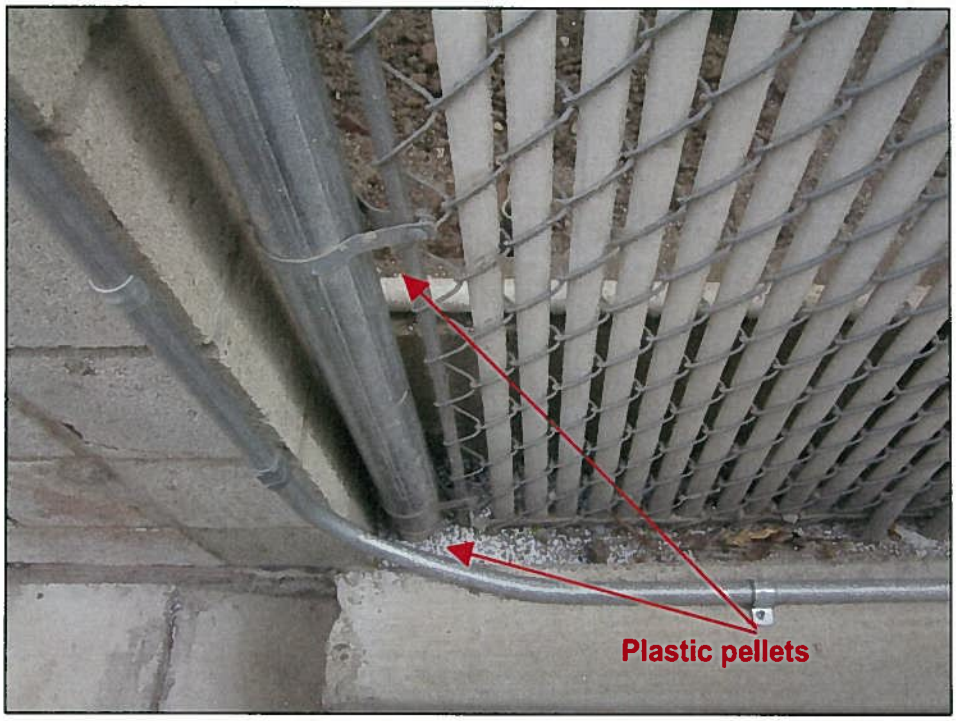
Photograph 23. View, facing southeast, of the Southeast Discharge Point, depicted in Photograph 2. Note the unauthorized NSWD of wash water actively occurring at the time of the inspection.

Photograph 24. View, facing north, of an unknown conveyance pipe leading from the southeastern corner of the Facility into the gutter of Branford Street.

Photograph 25. Up-close view of wash water discharging from the unknown conveyance pipe leading from the Facility onto the gutter of Branford Street, as shown in Photograph 24.

Photograph 26. View, facing west, of the wash water from the Facility accumulating in the curb and gutter line on Bradford Street.

Photograph 27. View, facing east, of the wash water discharged from the Facility accumulating in the curb and gutter line on Bradford Street.



Photograph 28. View, facing east, of plastic pellets collected on the impervious surface near the northern corner of the Facility. Note the uncontained plastic pellets outside of the Facility's chain-linked fence line.

Photograph 29. View, facing northeast, of wall and sidewalk repair occurring upgradient of the South Discharge Point at the time of the inspection.

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KJH 12/10/15

#1

Ordered By

Direct Pack Inc.
12243 Branford Street
Sun Valley, CA 91352-

Number of Pages	6
Date Received	09/15/2015
Date Reported	09/23/2015

Telephone: (818)896-1101
Attention: Luis Mendoza

Job Number	Order Date	Client
78260	09/15/2015	PLASTI

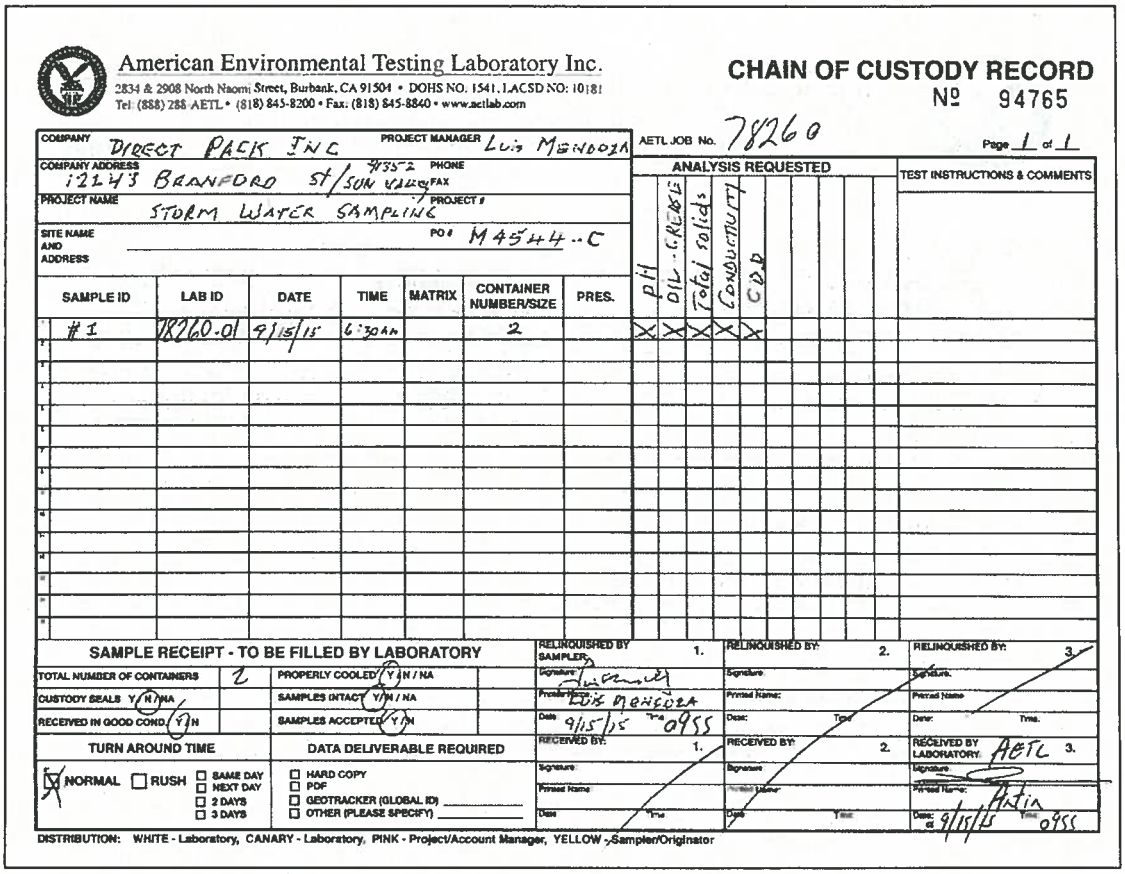
Project ID: 2015-2016
Project Name: Storm Water Monitoring
Site: 12243 Branford Street
Sun Valley, CA 91352

Enclosed please find results of analyses of 1 storm water sample which was analyzed as specified on the attached chain of custody. If there are any questions, please do not hesitate to call.

Checked By: _____ Approved By: C. Razmara

Cyrus Razmara, Ph.D.
Laboratory Director

Exhibit 1. *Page 1 of 10.* Analytical storm water monitoring data collected at the Southeast Discharge Point at the Facility on September 15, 2015.



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CHAIN OF CUSTODY RECORD
Nº 94765

COMPANY: DIRECT PACK INC — PROJECT MANAGER: LUIS MENDOZA — AETL JOB No. 78260 — Page 1 of 1
COMPANY ADDRESS: 12243 BRANFORD ST/SUN VALLEY — PHONE: 91352 — FAX:
PROJECT NAME: STORM WATER SAMPLING — PROJECT #:
SITE NAME AND ADDRESS: — PO#: M4544-C

SAMPLE ID	LAB ID	DATE	TIME	MATRIX	CONTAINER NUMBER/SIZE	PRES.	pH	O&G - GREASE	Total solids	Conductivity	CLD	TEST INSTRUCTIONS & COMMENTS
#1	78260-01	9/15/15	6:30AM		2		X	X	X	X	X	

SAMPLE RECEIPT - TO BE FILLED BY LABORATORY

TOTAL NUMBER OF CONTAINERS	2	PROPERLY COOLED (Y)N / NA	
CUSTODY SEALS Y (N) NA		SAMPLES INTACT (Y)N / NA	
RECEIVED IN GOOD COND. (Y)N		SAMPLES ACCEPTED (Y)N	

TURN AROUND TIME: [X] NORMAL [ ] RUSH — [ ] SAME DAY [ ] NEXT DAY [ ] 2 DAYS [ ] 3 DAYS

DATA DELIVERABLE REQUIRED: [ ] HARD COPY [ ] PDF [ ] GEOTRACKER (GLOBAL ID) _____ [ ] OTHER (PLEASE SPECIFY) _____

RELINQUISHED BY SAMPLER: 1.	RELINQUISHED BY: 2.	RELINQUISHED BY: 3.
Signature:	Signature:	Signature:
Printed Name: LUIS MENDOZA	Printed Name:	Printed Name:
Date: 9/15/15 Time: 0955	Date: Time:	Date: Time:
RECEIVED BY: 1.	**RECEIVED BY: 2.**	**RECEIVED BY LABORATORY: AETL 3.**
Signature:	Signature:	Signature:
Printed Name:	Printed Name:	Printed Name: Anita
Date: Time:	Date: Time:	Date: 9/15/15 Time: 0955

DISTRIBUTION: WHITE - Laboratory, CANARY - Laboratory, PINK - Project/Account Manager, YELLOW - Sampler/Originator

Exhibit 2. *Page 2 of 10.* Analytical storm water monitoring data collected at the Southeast Discharge Point at the Facility on September 15, 2015.

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Page: 1 A

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Direct Pack Inc.
12243 Branford Street
Sun Valley, CA 91352-

Project ID: 2015-2016
Date Received 09/15/2015
Date Reported 09/23/2015

Telephone: (818)896-1101
Attention: Luis Mendoza

Job Number	Order Date	Client
78260	09/15/2015	PLASTI

CERTIFICATE OF ANALYSIS
CASE NARRATIVE

AETL received 1 samples with the following specification on 09/15/2015.

Lab ID	Sample ID	Sample Date	Matrix	Quantity Of Containers
78260.01	#1	09/15/2015	Aqueous	2

Method	Submethod	Req Date	Priority	TAT	Units
SM-2510B		09/22/2015	2	Normal	umhos/cm
SM-2540-D		09/22/2015	2	Normal	mg/L
SM-4500-H-B		09/22/2015	2	Normal	pH unit
SM-5520B-E		09/22/2015	2	Normal	mg/L
SM5220D		09/22/2015	2	Normal	mg/L

The samples were analyzed as specified on the enclosed chain of custody.
No analytical non-conformances were encountered.

Checked By: _____ Approved By: _____

Cyrus Razmara, Ph.D.
Laboratory Director

Exhibit 3. *Page 3 of 10.* Analytical storm water monitoring data collected at the Southeast Discharge Point at the Facility on September 15, 2015.

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ANALYTICAL RESULTS

Ordered By

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Sun Valley, CA 91352-

Telephone: (818)896-1101
Attn: Luis Mendoza
Page: 2

Site

2243 Branford Street
Sun Valley, CA 91352

Project ID: 2015-2016
Project Name: Storm Water Monitoring

AETL Job Number	Submitted	Client
78260	09/15/2015	PLASTI

Method: SM-2510B, Conductance, Specific Conductance (at 25 Deg. C)

QC Batch No: 091515-1

Our Lab I.D.			Method Blank	78260.01			
Client Sample I.D.				#1			
Date Sampled				09/15/2015			
Date Prepared			09/15/2015	09/15/2015			
Preparation Method			SM2510B	SM2510B			
Date Analyzed			09/15/2015	09/15/2015			
Matrix			Aqueous	Aqueous			
Units			umhos/cm	umhos/cm			
Dilution Factor			1	1			
Analytes	**MDL**	**PQL**	**Results**	**Results**			
Specific conductance	5.0	10.0	ND	55.8			

QUALITY CONTROL REPORT

QC Batch No: 091515-1; Dup or Spiked Sample: 78260.01; LCS: Clean Water; LCS Prepared: 09/15/2015; LCS Analyzed: 09/15/2015; Units: umhos/cm

Analytes	SM Result	SM DUP Result	RPD %	SM RPD % Limit	LCS Concen	LCS Recov	LCS % REC	LCS/LCSD % Limit		
Specific conductance	55.8	54.4	2.5	<15	1,000	988	98.8	80-120		

Exhibit 4. *Page 4 of 10.* Analytical storm water monitoring data collected at the Southeast Discharge Point at the Facility on September 15, 2015.

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ANALYTICAL RESULTS

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Page: 3

Site

12243 Branford Street
Sun Valley, CA 91352

Project ID: 2015-2016
Project Name: Storm Water Monitoring

AETL Job Number	Submitted	Client
78260	09/15/2015	PLASTI

Method: SM-2540-D, Residue, Non-Filterable, Gravimetric Dried at 103-105C

QC Batch No: 091615-1

Our Lab I.D.			Method Blank	78260.01			
Client Sample I.D.				#1			
Date Sampled				09/15/2015			
Date Prepared			09/16/2015	09/16/2015			
Preparation Method			SM2540D	SM2540D			
Date Analyzed			09/16/2015	09/16/2015			
Matrix			Aqueous	Aqueous			
Units			mg/L	mg/L			
Dilution Factor			1	1			
Analytes	**MDL**	**PQL**	**Results**	**Results**			
Total Suspended Solids (TSS)	0.50	5.00	ND	16.0			

QUALITY CONTROL REPORT

QC Batch No: 091615-1; Dup or Spiked Sample: 78243.01; LCS: Clean Water; LCS Prepared: 09/16/2015; LCS Analyzed: 09/16/2015; Units: mg/L

Analytes	SM Result	SM DUP Result	RPD %	SM RPD % Limit	LCS Concen	LCS Recov	LCS % REC	LCS/LCSD % Limit		
Total Suspended Solids (TSS)	ND	ND	<1	<15	100	96.0	96.0	80-120		

Exhibit 5. *Page 5 of 10.* Analytical storm water monitoring data collected at the Southeast Discharge Point at the Facility on September 15, 2015.

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ANALYTICAL RESULTS

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Page: 4

Project ID: 2015-2016
Project Name: Storm Water Monitoring

Site

12243 Branford Street
Sun Valley CA 91352

AETL Job Number	Submitted	Client
78260	09/15/2015	PLASTI

Method: SM-4500-H-B, pH Electrometric (Standard Methods)

QC Batch No: 091515-1

Our Lab I.D.			78260.01				
Client Sample I.D.			#1				
Date Sampled			09/15/2015				
Date Prepared			09/15/2015				
Preparation Method			SM4500HB				
Date Analyzed			09/15/2015				
Matrix			Aqueous				
Units			pH unit				
Dilution Factor			1				
Analytes	**MDL**	**PQL**	**Results**				
pH	0.01	0.01	7.77				
Temperature (C)	0.01	0.01	23.9				

QUALITY CONTROL REPORT

QC Batch No: 091515-1; Dup or Spiked Sample: 78246.01; LCS: Clean Water; LCS Prepared: 09/15/2015; LCS Analyzed: 09/15/2015; Units: pH unit

Analytes	SM Result	SM DUP Result	RPD %	SM RPD % Limit	LCS Concen	LCS Recov	LCS % REC	LCS/LCSD % Limit		
pH	6.90	6.90	<1	<15	7.00	7.21	103	80-120		

Exhibit 6. *Page 6 of 10.* Analytical storm water monitoring data collected at the Southeast Discharge Point at the Facility on September 15, 2015.

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ANALYTICAL RESULTS

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Page: 5

Site

12243 Branford Street
Sun Valley, CA 91352

Project ID: 2015-2016
Project Name: Storm Water Monitoring

AETL Job Number	Submitted	Client
78260	09/15/2015	PLASTI

Method: SM-5520B-E, Oil & Grease, Liquid-Liquid, Partition-Gravimetric Method

QC Batch No: 092115-1

Our Lab I.D.			Method Blank	78260.01			
Client Sample I.D.				#1			
Date Sampled				09/15/2015			
Date Prepared			09/21/2015	09/21/2015			
Preparation Method			SM5520BE	SM5520BE			
Date Analyzed			09/22/2015	09/22/2015			
Matrix			Aqueous	Aqueous			
Units			mg/L	mg/L			
Dilution Factor			1	1			
Analytes	**MDL**	**PQL**	**Results**	**Results**			
Oil and Grease	5	10	ND	ND			

QUALITY CONTROL REPORT

QC Batch No: 092115-1; LCS: Clean Water; LCS Prepared: 09/21/2015; LCS Analyzed: 09/22/2015; Units: mg/L

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS DUP Concen	LCS DUP Recov	LCS DUP % REC	LCS RPD % REC	LCS/LCSD % Limit	LCS RPD % Limit	
Oil and Grease	40.0	32.7	81.8	40.0	37.8	94.5	14.4	80-120	<15	

Exhibit 7. *Page 7 of 10.* Analytical storm water monitoring data collected at the Southeast Discharge Point at the Facility on September 15, 2015.

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ANALYTICAL RESULTS

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12243 Branford Street
Sun Valley, CA 91352-

Telephone: (818)896-1101
Attn: Luis Mendoza
Page: 6

Project ID: 2015-2016
Project Name: Storm Water Monitoring

Site

12243 Branford Street
Sun Valley, CA 91352

AETL Job Number	Submitted	Client
78260	09/15/2015	PLASTI

Method: SM5220D, Chemical Oxygen Demand, Colorimetric (Standard Methods)

QC Batch No: 091515-1

Our Lab I.D.			Method Blank	78260.01			
Client Sample I.D.				#1			
Date Sampled				09/15/2015			
Date Prepared			09/15/2015	09/15/2015			
Preparation Method			SM5220D	SM5220D			
Date Analyzed			09/15/2015	09/15/2015			
Matrix			Aqueous	Aqueous			
Units			mg/L	mg/L			
Dilution Factor			1	1			
Analytes	MDL	PQL	Results	Results			
Chemical Oxygen Demand	5.0	10.0	ND	70.9			

QUALITY CONTROL REPORT

QC Batch No: 091515-1; Dup or Spiked Sample: 78246.01; LCS: Clean Water; QC Prepared: 09/15/2015; QC Analyzed: 09/15/2015; Units: mg/L

Analytes	Sample Result	MS Concen	MS Recov	MS % REC	MS DUP Concen	MS DUP Recov	MS DUP % REC	RPD %	MS/MSD % Limit	MS RPD % Limit
Chemical Oxygen Demand	129	100	220	91.2	100	221	92.4	1.3	80-120	<15

QC Batch No: 091515-1; Dup or Spiked Sample: 78246.01; LCS: Clean Water; QC Prepared: 09/15/2015; QC Analyzed: 09/15/2015; Units: mg/L

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS DUP Concen	LCS DUP Recov	LCS DUP % REC	LCS RPD % REC	LCS/LCSD % Limit	LCS RPD % Limit	
Chemical Oxygen Demand	200	180	90.0	200	182	91.0	1.1	80-120	<15	

Exhibit 8. *Page 8 of 10.* Analytical storm water monitoring data collected at the Southeast Discharge Point at the Facility on September 15, 2015.

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Data Qualifiers and Descriptors

Data Qualifier:

#:	Recovery is not within acceptable control limits.
*:	In the QC section, sample results have been taken directly from the ICP reading. No preparation factor has been applied.
B:	Analyte was present in the Method Blank.
D:	Result is from a diluted analysis.
E:	Result is beyond calibration limits and is estimated.
H:	Analysis was performed over the allowed holding time due to circumstances which were beyond laboratory control.
J:	Analyte was detected . However, the analyte concentration is an estimated value, which is between the Method Detection Limit (MDL) and the Practical Quantitation Limit (PQL).
M:	Matrix spike recovery is outside control limits due to matrix interference. Laboratory Control Sample recovery was acceptable.
MCL:	Maximum Contaminant Level
NS:	No Standard Available
S6:	Surrogate recovery is outside control limits due to matrix interference.
S8:	The analysis of the sample required a dilution such that the surrogate concentration was diluted below the method acceptance criteria.
X:	Results represent LCS and LCSD data.

Definition:

%Limi:	Percent acceptable limits.
%REC:	Percent recovery.
Con.L:	Acceptable Control Limits
Conce:	Added concentration to the sample.
LCS:	Laboratory Control Sample
MDL:	Method Detection Limit is a statistically derived number which is specific for each instrument, each method, and each compound. It indicates a distinctively detectable quantity with 99% probability.

Exhibit 9. *Page 9 of 10.* Analytical storm water monitoring data collected at the Southeast Discharge Point at the Facility on September 15, 2015.

American Environmental Testing Laboratory Inc.
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Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

Data Qualifiers and Descriptors

MS:	Matrix Spike
MS DU:	Matrix Spike Duplicate
ND:	Analyte was not detected in the sample at or above MDL.
PQL:	Practical Quantitation Limit or ML (Minimum Level as per RWQCB) is the minimum concentration that can be quantified with more than 99% confidence. Taking into account all aspects of the entire analytical instrumentation and practice.
Recov:	Recovered concentration in the sample.
RPD:	Relative Percent Difference

Exhibit 10. *Page 10 of 10.* Analytical storm water monitoring data collected at the Southeast Discharge Point at the Facility on September 15, 2015.

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#2

12/10/15

Ordered By

Direct Pack Inc.
12243 Branford Street
Sun Valley, CA 91352-

Telephone: (818) 896-1101
Attention: Luis Mendoza

Number of Pages 6
Date Received 09/15/2015
Date Reported 09/23/2015

Job Number	Order Date	Client
78261	09/15/2015	PLASTI

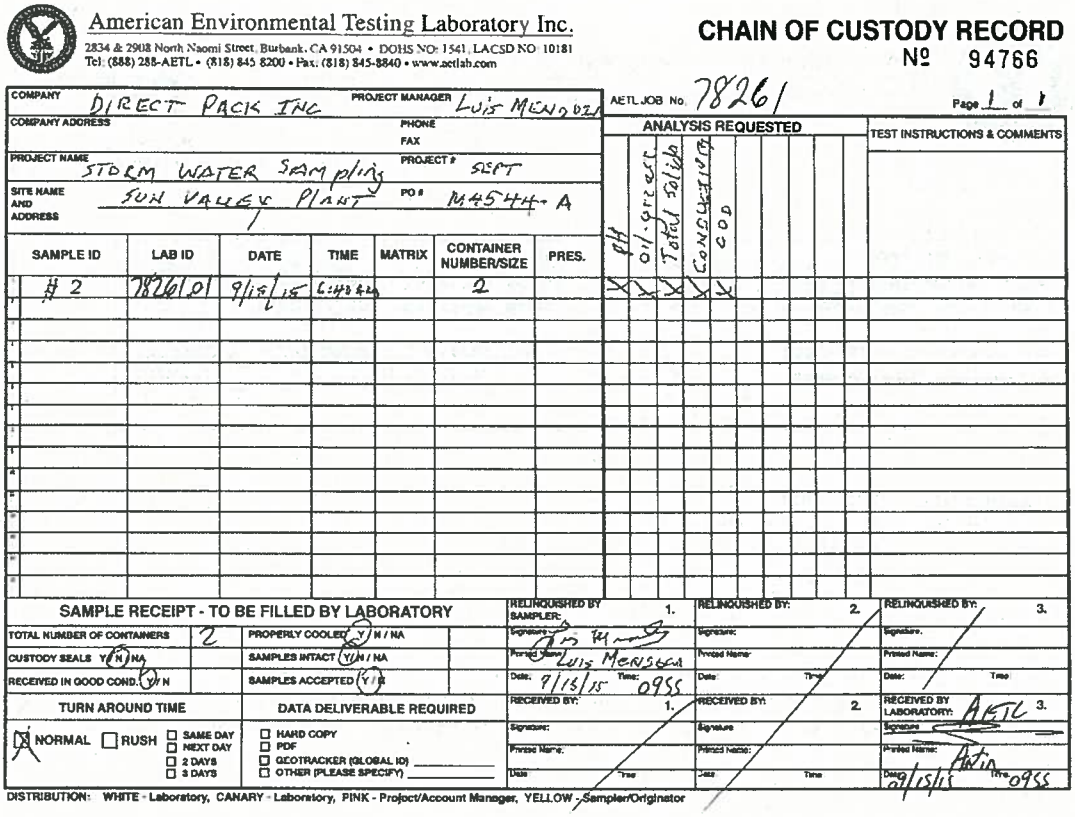
Project ID: 2015-2016
Project Name: Storm Water Monitoring
Site: 12243 Branford Street
Sun Valley, CA 91352

Enclosed please find results of analyses of 1 storm water sample which was analyzed as specified on the attached chain of custody. If there are any questions, please do not hesitate to call.

Checked By: _____ Approved By: _____

Cyrus Razmara, Ph.D.
Laboratory Director

Exhibit 11. *Page 1 of 8.* Analytical storm water monitoring data collected at the South Discharge Point at the Facility on September 15, 2015.



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CHAIN OF CUSTODY RECORD
Nº 94766

COMPANY: DIRECT PACK INC — PROJECT MANAGER: LUIS MENDOZA — AETL JOB No. 7826 — Page 1 of 1
COMPANY ADDRESS — PHONE — FAX
PROJECT NAME: STORM WATER SAMPLING — PROJECT #: SEPT
SITE NAME AND ADDRESS: SUN VALLEY PLANT — PO #: M4544-A

SAMPLE ID	LAB ID	DATE	TIME	MATRIX	CONTAINER NUMBER/SIZE	PRES.
# 2	7826.01	9/15/15	6:45 AM		2	

ANALYSIS REQUESTED: pH; O/I-grease; Total Solids; CONDUCTIVITY; COD

TEST INSTRUCTIONS & COMMENTS

SAMPLE RECEIPT - TO BE FILLED BY LABORATORY
TOTAL NUMBER OF CONTAINERS: 2 — PROPERLY COOLED: (Y) N / NA
CUSTODY SEALS: Y (N) NA — SAMPLES INTACT: (Y) N / NA
RECEIVED IN GOOD COND.: (Y) N — SAMPLES ACCEPTED: (Y) N

TURN AROUND TIME: [X] NORMAL [ ] RUSH — [ ] SAME DAY [ ] NEXT DAY [ ] 2 DAYS [ ] 3 DAYS
DATA DELIVERABLE REQUIRED: [ ] HARD COPY [ ] PDF [ ] GEOTRACKER (GLOBAL ID) _____ [ ] OTHER (PLEASE SPECIFY) _____

RELINQUISHED BY SAMPLER: 1.	RELINQUISHED BY: 2.	RELINQUISHED BY: 3.
Signature: [signature]	Signature:	Signature:
Printed Name: LUIS MENDOZA	Printed Name:	Printed Name:
Date: 9/15/15 Time: 0955	Date: Time:	Date: Time:
RECEIVED BY: 1.	RECEIVED BY: 2.	RECEIVED BY LABORATORY: AETL 3.
Signature:	Signature	Signature
Printed Name:	Printed Name:	Printed Name: Alvin
Date: Time:	Date: Time:	Date: 9/15/15 Time: 0955

DISTRIBUTION: WHITE - Laboratory, CANARY - Laboratory, PINK - Project/Account Manager, YELLOW - Sampler/Originator

Exhibit 12. *Page 2 of 8.* Analytical storm water monitoring data collected at the South Discharge Point at the Facility on September 15, 2015.

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Page: 1 A

Ordered By

Direct Pack Inc.
12243 Branford Street
Sun Valley, CA 91352-

Project ID: 2015-2016
Date Received 09/15/2015
Date Reported 09/23/2015

Telephone: (818)896-1101
Attention: Luis Mendoza

Job Number	Order Date	Client
78261	09/15/2015	PLASTI

CERTIFICATE OF ANALYSIS
CASE NARRATIVE

AETL received 1 samples with the following specification on 09/15/2015.

Lab ID	Sample ID	Sample Date	Matrix	Quantity Of Containers
78261.01	#2	09/15/2015	Aqueous	2

Method ^ Submethod	Req Date	Priority	TAT	Units
SM-2510B	09/22/2015	2	Normal	umhos/cm
SM-2540-D	09/22/2015	2	Normal	mg/L
SM-4500-H-B	09/22/2015	2	Normal	pH unit
SM-5520B-E	09/22/2015	2	Normal	mg/L
SM5220D	09/22/2015	2	Normal	mg/L

The samples were analyzed as specified on the enclosed chain of custody.
No analytical non-conformances were encountered.

Checked By: _____ Approved By: _____

Cyrus Razmara, Ph.D.
Laboratory Director

Exhibit 13. *Page 3 of 8.* Analytical storm water monitoring data collected at the South Discharge Point at the Facility on September 15, 2015.

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ANALYTICAL RESULTS

Ordered By

Direct Pack Inc.
12243 Branford Street
Sun Valley, CA 91352-

Telephone: (818)896-1101
Attn: Luis Mendoza
Page: 2

Project ID: 2015-2016
Project Name: Storm Water Monitoring

Site

12243 Branford Street
Sun Valley, CA 91352

AETL Job Number	Submitted	Client
78261	09/15/2015	PLASTI

Method: SM-2510B, Conductance, Specific Conductance (at 25 Deg. C)

QC Batch No: 091515-1

Our Lab I.D.			Method Blank	78261.01			
Client Sample I.D.				#2			
Date Sampled				09/15/2015			
Date Prepared			09/15/2015	09/15/2015			
Preparation Method			SM2510B	SM2510B			
Date Analyzed			09/15/2015	09/15/2015			
Matrix			Aqueous	Aqueous			
Units			umhos/cm	umhos/cm			
Dilution Factor			1	1			
Analytes	**MDL**	**PQL**	**Results**	**Results**			
Specific conductance	5.0	10.0	ND	42.9			

QUALITY CONTROL REPORT

QC Batch No: 091515-1; Dup or Spiked Sample: 78260.01; LCS: Clean Water; LCS Prepared: 09/15/2015; LCS Analyzed: 09/15/2015;
Units: umhos/cm

Analytes	SM Result	SM DUP Result	RPD %	SM RPD % Limit	LCS Concen	LCS Recov	LCS % REC	LCS/LCSD % Limit		
Specific conductance	55.8	54.4	2.5	<15	1,000	988	98.8	80-120		

Exhibit 14. *Page 4 of 8.* Analytical storm water monitoring data collected at the South Discharge Point at the Facility on September 15, 2015.

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ANALYTICAL RESULTS

Ordered By

Direct Pack Inc.
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Sun Valley, CA 91352-

Telephone: (818)896-1101
Attn: Luis Mendoza
Page: 3

Project ID: 2015-2016
Project Name: Storm Water Monitoring

Site

12243 Branford Street
Sun Valley, CA 91352

AETL Job Number	Submitted	Client
78261	09/15/2015	PLASTI

Method: SM-2540-D, Residue, Non-Filterable, Gravimetric Dried at 103-105C

QC Batch No: 091615-1

Our Lab I.D.			Method Blank	78261.01			
Client Sample I.D.				#2			
Date Sampled				09/15/2015			
Date Prepared			09/16/2015	09/16/2015			
Preparation Method			SM2540D	SM2540D			
Date Analyzed			09/16/2015	09/16/2015			
Matrix			Aqueous	Aqueous			
Units			mg/L	mg/L			
Dilution Factor			1	1			
Analytes	**MDL**	**PQL**	**Results**	**Results**			
Total Suspended Solids (TSS)	0.50	5.00	ND	8.67			

QUALITY CONTROL REPORT

QC Batch No: 091615-1; Dup or Spiked Sample: 78243.01; LCS: Clean Water; LCS Prepared: 09/16/2015; LCS Analyzed: 09/16/2015;
Units: mg/L

Analytes	SM Result	SM DUP Result	RPD %	SM RPD % Limit	LCS Concen	LCS Recov	LCS % REC	LCS/LCSD % Limit		
Total Suspended Solids (TSS)	ND	ND	<1	<15	100	96.0	96.0	80-120		

Exhibit 15. *Page 5 of 8.* Analytical storm water monitoring data collected at the South Discharge Point at the Facility on September 15, 2015.

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ANALYTICAL RESULTS

Ordered By
Direct Pack Inc.
12243 Branford Street
Sun Valley, CA 91352-

Telephone: (818)896-1101
Attn: Luis Mendoza
Page: 4

Site
12243 Branford Street
Sun Valley, CA 91352

Project ID: 2015-2016
Project Name: Storm Water Monitoring

AETL Job Number	Submitted	Client
78261	09/15/2015	PLASTI

Method: SM-4500-H-B, pH Electrometric (Standard Methods)
QC Batch No: 091515-1

Our Lab I.D.			78261.01				
Client Sample I.D.			#2				
Date Sampled			09/15/2015				
Date Prepared			09/15/2015				
Preparation Method			SM4500HB				
Date Analyzed			09/15/2015				
Matrix			Aqueous				
Units			pH unit				
Dilution Factor			1				
Analytes	**MDL**	**PQL**	**Results**				
pH	0.01	0.01	7.77				
Temperature (C)	0.01	0.01	24.2				

QUALITY CONTROL REPORT

QC Batch No: 091515-1; Dup or Spiked Sample: 78246.01; LCS: Clean Water; LCS Prepared: 09/15/2015; LCS Analyzed: 09/15/2015; Units: pH unit

Analytes	SM Result	SM DUP Result	RPD %	SM RPD % Limit	LCS Concen	LCS Recov	LCS % REC	LCS/LCSD % Limit		
pH	6.90	6.90	<1	<15	7.00	7.21	103	80-120		

Exhibit 16. *Page 6 of 8.* Analytical storm water monitoring data collected at the South Discharge Point at the Facility on September 15, 2015.

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ANALYTICAL RESULTS

Ordered By

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12243 Branford Street
Sun Valley, CA 91352-

Telephone: (818)896-1101
Attn: Luis Mendoza
Page: 5

Project ID: 2015-2016
Project Name: Storm Water Monitoring

Site

12243 Branford Street
Sun Valley, CA 91352

AETL Job Number	Submitted	Client
78261	09/15/2015	PLASTI

Method: SM-5520B-E, Oil & Grease, Liquid-Liquid, Partition-Gravimetric Method

QC Batch No: 092115-1

Our Lab I.D.			Method Blank	78261.01			
Client Sample I.D.				#2			
Date Sampled				09/15/2015			
Date Prepared			09/21/2015	09/21/2015			
Preparation Method			SM5520BE	SM5520BE			
Date Analyzed			09/22/2015	09/22/2015			
Matrix			Aqueous	Aqueous			
Units			mg/L	mg/L			
Dilution Factor			1	1			
Analytes	**MDL**	**PQL**	**Results**	**Results**			
Oil and Grease	5	10	ND	ND			

QUALITY CONTROL REPORT

QC Batch No: 092115-1; LCS: Clean Water; LCS Prepared: 09/21/2015; LCS Analyzed: 09/22/2015; Units: mg/L

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS DUP Concen	LCS DUP Recov	LCS DUP % REC	LCS RPD % REC	LCS/LCSD % Limit	LCS RPD % Limit	
Oil and Grease	40.0	32.7	81.8	40.0	37.8	94.5	14.4	80-120	<15	

Exhibit 17. *Page 7 of 8.* Analytical storm water monitoring data collected at the South Discharge Point at the Facility on September 15, 2015.

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ANALYTICAL RESULTS

Ordered By

Direct Pack Inc.
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Sun Valley, CA 91352-

Telephone: (818)896-1101
Attn: Luis Mendoza
Page: 6

Site

12243 Branford Street
Sun Valley, CA 91352

Project ID: 2015-2016
Project Name: Storm Water Monitoring

AETL Job Number	Submitted	Client
78261	09/15/2015	PLASTI

Method: SM5220D, Chemical Oxygen Demand, Colorimetric (Standard Methods)

QC Batch No: 091515-1

Our Lab I.D.			Method Blank	78261.01			
Client Sample I.D.				#2			
Date Sampled				09/15/2015			
Date Prepared			09/15/2015	09/15/2015			
Preparation Method			SM5220D	SM5220D			
Date Analyzed			09/15/2015	09/15/2015			
Matrix			Aqueous	Aqueous			
Units			mg/L	mg/L			
Dilution Factor			1	1			
Analytes	**MDL**	**PQL**	**Results**	**Results**			
Chemical Oxygen Demand	5.0	10.0	ND	61.7			

QUALITY CONTROL REPORT

QC Batch No: 091515-1; Dup or Spiked Sample: 78246.01; LCS: Clean Water; QC Prepared: 09/15/2015; QC Analyzed: 09/15/2015; Units: mg/L

Analytes	Sample Result	MS Concen	MS Recov	MS % REC	MS DUP Concen	MS DUP Recov	MS DUP % REC	RPD %	MS/MSD % Limit	MS RPD % Limit
Chemical Oxygen Demand	129	100	220	91.2	100	221	92.4	1.3	80-120	<15

QC Batch No: 091515-1; Dup or Spiked Sample: 78246.01; LCS: Clean Water; QC Prepared: 09/15/2015; QC Analyzed: 09/15/2015; Units: mg/L

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS DUP Concen	LCS DUP Recov	LCS DUP % REC	LCS RPD % REC	LCS/LCSD % Limit	LCS RPD % Limit	
Chemical Oxygen Demand	200	180	90.0	200	182	91.0	1.1	80-120	<15	

Exhibit 18. *Page 8 of 8.* Analytical storm water monitoring data collected at the South Discharge Point at the Facility on September 15, 2015.

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#3

12/10/15

Ordered By

Direct Pack Inc.
12243 Branford Street
Sun Valley, CA 91352-

Number of Pages 6
Date Received 09/15/2015
Date Reported 09/23/2015

Telephone: (818)896-1101
Attention: Luis Mendoza

Job Number	Order Date	Client
78262	09/15/2015	PLASTI

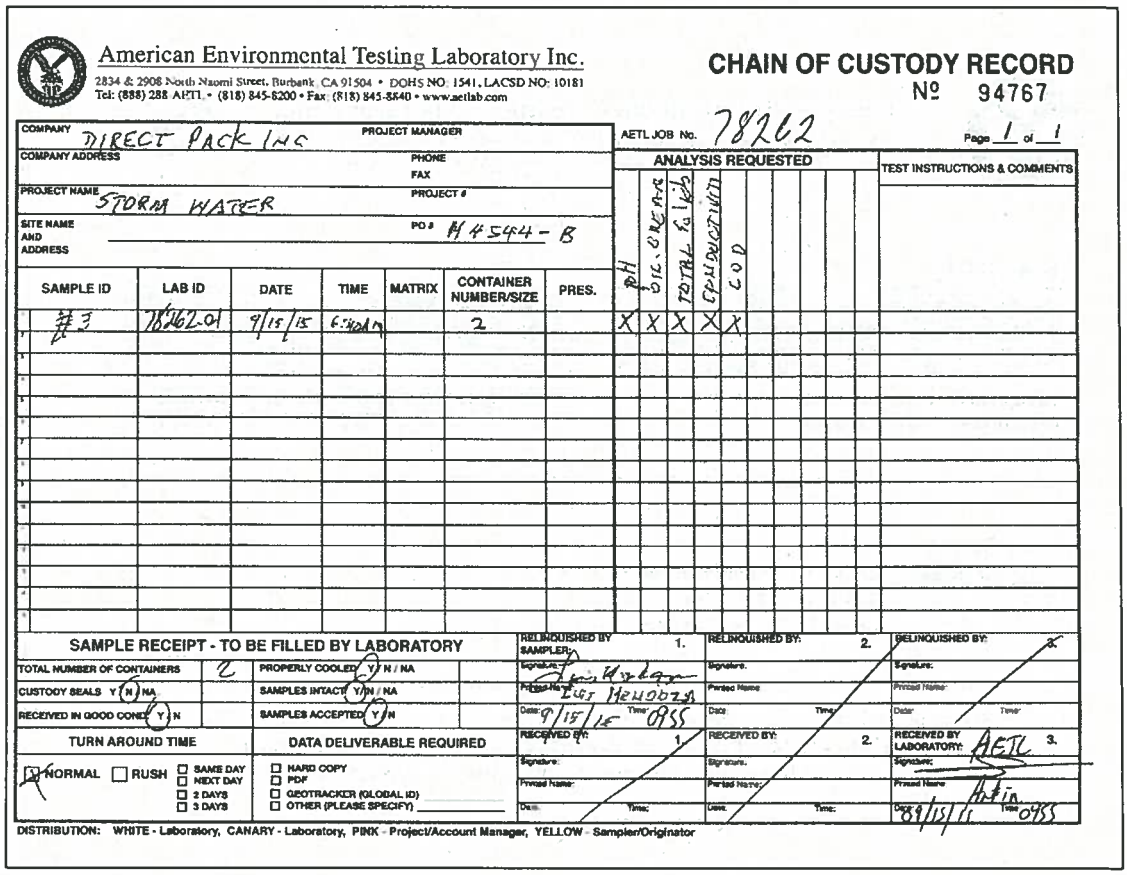
Project ID: 2015-2016
Project Name: Storm Water Monitoring
Site: 12243 Branford Street
Sun Valley, CA 91352

Enclosed please find results of analyses of 1 storm water sample which was analyzed as specified on the attached chain of custody. If there are any questions, please do not hesitate to call.

Checked By: _____ Approved By: C. Razmara

Cyrus Razmara, Ph.D.
Laboratory Director

Exhibit 19. *Page 1 of 8.* Analytical storm water monitoring data collected at the Northwest Discharge Point at the Facility on September 15, 2015.



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CHAIN OF CUSTODY RECORD
№ 94767

COMPANY: DIRECT PACK INC — PROJECT MANAGER
COMPANY ADDRESS — PHONE — FAX
PROJECT NAME: STORM WATER — PROJECT #
SITE NAME AND ADDRESS — PO # M4544-B
AETL JOB No. 78262 — Page 1 of 1

ANALYSIS REQUESTED: pH; OIL & GREASE; TOTAL SUSPENDED SOLIDS; COD

SAMPLE ID	LAB ID	DATE	TIME	MATRIX	CONTAINER NUMBER/SIZE	PRES.	TEST INSTRUCTIONS & COMMENTS
#3	78262-01	9/15/15	6:40AM		2		

SAMPLE RECEIPT - TO BE FILLED BY LABORATORY
TOTAL NUMBER OF CONTAINERS: 2 — PROPERLY COOLED: Y / N / NA
CUSTODY SEALS Y (N) NA — SAMPLES INTACT: Y / N / NA
RECEIVED IN GOOD COND: (Y) N — SAMPLES ACCEPTED: (Y) N

TURN AROUND TIME: [X] NORMAL [ ] RUSH — [ ] SAME DAY [ ] NEXT DAY [ ] 2 DAYS [ ] 3 DAYS
DATA DELIVERABLE REQUIRED: [ ] HARD COPY [ ] PDF [ ] GEOTRACKER (GLOBAL ID) _____ [ ] OTHER (PLEASE SPECIFY) _____

RELINQUISHED BY SAMPLER: 1. — Signature: — Printed Name: LUIS HERNANDEZ — Date: 9/15/15 Time: 0955
RELINQUISHED BY: 2. — Signature: — Printed Name: — Date: — Time:
RELINQUISHED BY: 3. — Signature: — Printed Name: — Date: — Time:
RECEIVED BY: 1. — Signature: — Printed Name: — Date: — Time:
RECEIVED BY: 2. — Signature: — Printed Name: — Date: — Time:
RECEIVED BY LABORATORY: AETL 3. — Signature: — Printed Name: — Date: 9/15/15 Time: 0955

DISTRIBUTION: WHITE - Laboratory, CANARY - Laboratory, PINK - Project/Account Manager, YELLOW - Sampler/Originator

Exhibit 20. *Page 2 of 8.* Analytical storm water monitoring data collected at the Northwest Discharge Point at the Facility on September 15, 2015.

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Page: 1 A

Ordered By

Direct Pack Inc.
12243 Branford Street
Sun Valley, CA 91352-

Project ID: 2015-2016
Date Received 09/15/2015
Date Reported 09/23/2015

Telephone: (818) 896-1101
Attention: Luis Mendoza

Job Number	Order Date	Client
78262	09/15/2015	PLASTI

CERTIFICATE OF ANALYSIS
CASE NARRATIVE

AETL received 1 samples with the following specification on 09/15/2015.

Lab ID	Sample ID	Sample Date	Matrix	Quantity Of Containers
78262.01	#3	09/15/2015	Aqueous	2

Method ^ Submethod	Req Date	Priority	TAT	Units
SM-2510B	09/22/2015	2	Normal	umhos/cm
SM-2540-D	09/22/2015	2	Normal	mg/L
SM-4500-H-B	09/22/2015	2	Normal	pH unit
SM-5520B-E	09/22/2015	2	Normal	mg/L
SM5220D	09/22/2015	2	Normal	mg/L

The samples were analyzed as specified on the enclosed chain of custody.
No analytical non-conformances were encountered.

Checked By: _____ Approved By: _____

Cyrus Razmara, Ph.D.
Laboratory Director

Exhibit 21. *Page 3 of 8.* Analytical storm water monitoring data collected at the Northwest Discharge Point at the Facility on September 15, 2015.

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ANALYTICAL RESULTS

Ordered By

Direct Pack Inc.
12243 Branford Street
Sun Valley, CA 91352-

Telephone: (818)896-1101
Attn: Luis Mendoza
Page: 2

Site

12243 Branford Street
Sun Valley, CA 91352

Project ID: 2015-2016
Project Name: Storm Water Monitoring

AETL Job Number	Submitted	Client
78262	09/15/2015	PLASTI

Method: SM-2510B, Conductance, Specific Conductance (at 25 Deg. C)

QC Batch No: 091515-1

Our Lab I.D.			Method Blank	78262.01			
Client Sample I.D.				#3			
Date Sampled				09/15/2015			
Date Prepared			09/15/2015	09/15/2015			
Preparation Method			SM2510B	SM2510B			
Date Analyzed			09/15/2015	09/15/2015			
Matrix			Aqueous	Aqueous			
Units			umhos/cm	umhos/cm			
Dilution Factor			1	1			
Analytes	**MDL**	**PQL**	**Results**	**Results**			
Specific conductance	5.0	10.0	ND	63.1			

QUALITY CONTROL REPORT

QC Batch No: 091515-1; Dup or Spiked Sample: 78260.01; LCS: Clean Water; LCS Prepared: 09/15/2015; LCS Analyzed: 09/15/2015; Units: umhos/cm

Analytes	SM Result	SM DUP Result	RPD %	SM RPD % Limit	LCS Concen	LCS Recov	LCS % REC	LCS/LCSD % Limit		
Specific conductance	55.8	54.4	2.5	<15	1,000	988	98.8	80-120		

Exhibit 22. *Page 4 of 8.* Analytical storm water monitoring data collected at the Northwest Discharge Point at the Facility on September 15, 2015.

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ANALYTICAL RESULTS

Ordered By

Direct Pack Inc.
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Sun Valley, CA 91352-

Telephone: (818)896-1101
Attn: Luis Mendoza
Page: 3

Project ID: 2015-2016
Project Name: Storm Water Monitoring

Site

12243 Branford Street
Sun Valley, CA 91352

AETL Job Number	Submitted	Client
78262	09/15/2015	PLASTI

Method: SM-2540-D, Residue, Non-Filterable, Gravimetric Dried at 103-105C

QC Batch No: 091615-1

Our Lab I.D.			Method Blank	78262.01			
Client Sample I.D.				#3			
Date Sampled				09/15/2015			
Date Prepared			09/16/2015	09/16/2015			
Preparation Method			SM2540D	SM2540D			
Date Analyzed			09/16/2015	09/16/2015			
Matrix			Aqueous	Aqueous			
Units			mg/L	mg/L			
Dilution Factor			1	1			
Analytes	**MDL**	**PQL**	**Results**	**Results**			
Total Suspended Solids (TSS)	0.50	5.00	ND	8.67			

QUALITY CONTROL REPORT

QC Batch No: 091615-1; Dup or Spiked Sample: 78243.01; LCS: Clean Water; LCS Prepared: 09/16/2015; LCS Analyzed: 09/16/2015; Units: mg/L

Analytes	SM Result	SM DUP Result	RPD %	SM RPD % Limit	LCS Concen	LCS Recov	LCS % REC	LCS/LCSD % Limit		
Total Suspended Solids (TSS)	ND	ND	<1	<15	100	96.0	96.0	80-120		

Exhibit 23. *Page 5 of 8.* Analytical storm water monitoring data collected at the Northwest Discharge Point at the Facility on September 15, 2015.

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ANALYTICAL RESULTS

Ordered By

Direct Pack Inc.
12243 Branford Street
Sun Valley, CA 91352-

Telephone: (818)896-1101
Attn: Luis Mendoza
Page: 4

Site

12243 Branford Street
Sun Valley, CA 91352

Project ID: 2015-2016
Project Name: Storm Water Monitoring

AETL Job Number	Submitted	Client
78262	09/15/2015	PLASTI

Method: SM-4500-H-B, pH Electrometric (Standard Methods)
QC Batch No: 091515-1

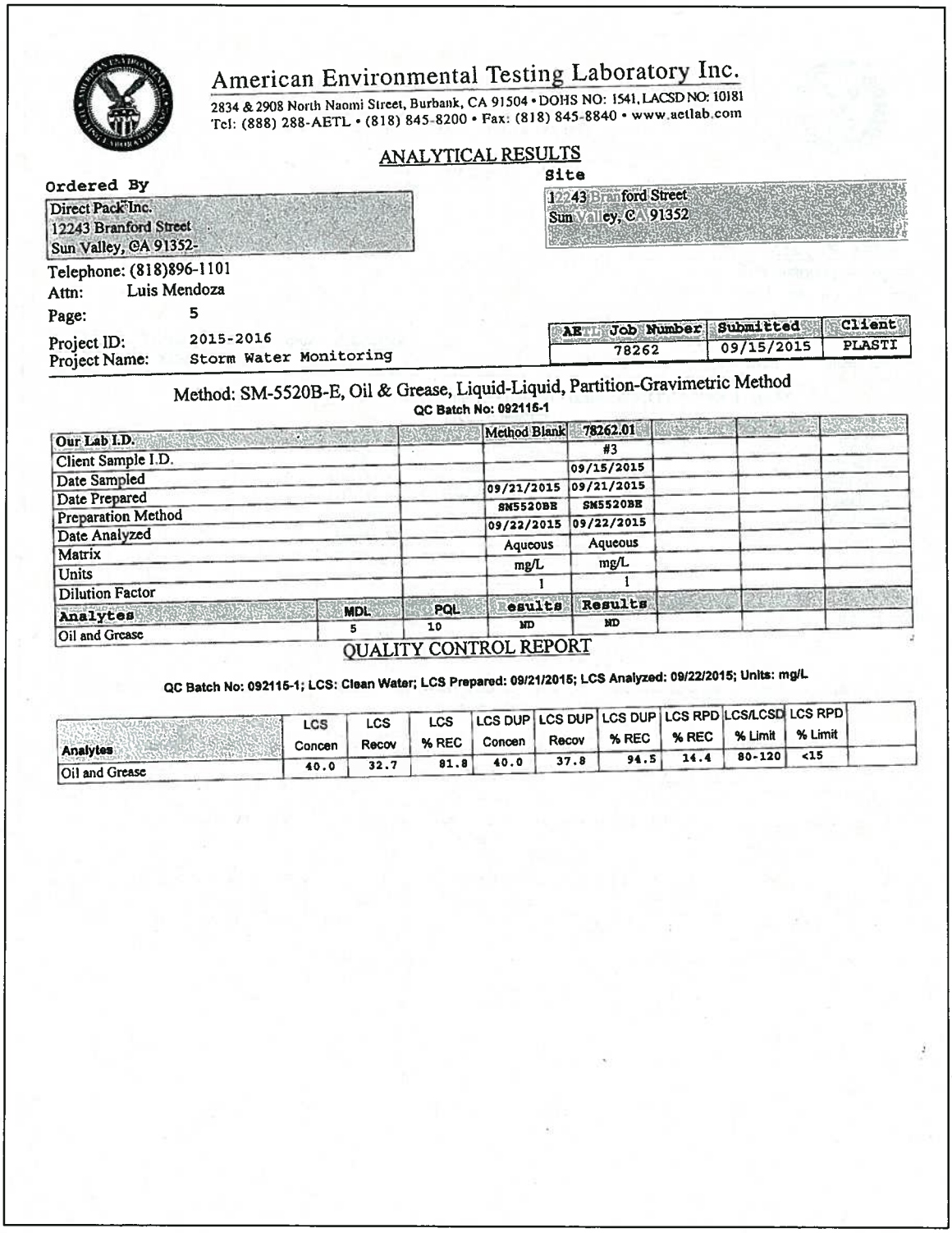
Our Lab I.D.			78262.01				
Client Sample I.D.			#3				
Date Sampled			09/15/2015				
Date Prepared			09/15/2015				
Preparation Method			SM4500HB				
Date Analyzed			09/15/2015				
Matrix			Aqueous				
Units			pH unit				
Dilution Factor			1				
Analytes	**MDL**	**PQL**	**Results**				
pH	0.01	0.01	7.69				
Temperature (C)	0.01	0.01	24.3				

QUALITY CONTROL REPORT

QC Batch No: 091515-1; Dup or Spiked Sample: 78246.01; LCS: Clean Water; LCS Prepared: 09/15/2015; LCS Analyzed: 09/15/2015;
Units: pH unit

Analytes	SM Result	SM DUP Result	RPD %	SM RPD % Limit	LCS Concen	LCS Recov	LCS % REC	LCS/LCSD % Limit		
pH	6.90	6.90	<1	<15	7.00	7.21	103	80-120		

Exhibit 24. *Page 6 of 8.* Analytical storm water monitoring data collected at the Northwest Discharge Point at the Facility on September 15, 2015.



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ANALYTICAL RESULTS

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Page: 5
Project ID: 2015-2016
Project Name: Storm Water Monitoring

Site

12243 Branford Street
Sun Valley, CA 91352

AETL Job Number	Submitted	Client
78262	09/15/2015	PLASTI

Method: SM-5520B-E, Oil & Grease, Liquid-Liquid, Partition-Gravimetric Method

QC Batch No: 092115-1

Our Lab I.D.			Method Blank	78262.01			
Client Sample I.D.				#3			
Date Sampled				09/15/2015			
Date Prepared			09/21/2015	09/21/2015			
Preparation Method			SM5520BE	SM5520BE			
Date Analyzed			09/22/2015	09/22/2015			
Matrix			Aqueous	Aqueous			
Units			mg/L	mg/L			
Dilution Factor			1	1			
Analytes	MDL	PQL	esults	Results			
Oil and Grease	5	10	ND	ND			

QUALITY CONTROL REPORT

QC Batch No: 092115-1; LCS: Clean Water; LCS Prepared: 09/21/2015; LCS Analyzed: 09/22/2015; Units: mg/L

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS DUP Concen	LCS DUP Recov	LCS DUP % REC	LCS RPD % REC	LCS/LCSD % Limit	LCS RPD % Limit	
Oil and Grease	40.0	32.7	81.8	40.0	37.8	94.5	14.4	80-120	<15	

Exhibit 25. *Page 7 of 8.* Analytical storm water monitoring data collected at the Northwest Discharge Point at the Facility on September 15, 2015.

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ANALYTICAL RESULTS

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Page: 6

Site

12243 Branford Street
Sun Valley, CA 91352

Project ID: 2015-2016
Project Name: Storm Water Monitoring

AETL Job Number	Submitted	Client
78262	09/15/2015	PLASTI

Method: SM5220D, Chemical Oxygen Demand, Colorimetric (Standard Methods)

QC Batch No: 091515-1

Our Lab I.D.			Method Blank	78262.01			
Client Sample I.D.				#3			
Date Sampled				09/15/2015			
Date Prepared			09/15/2015	09/15/2015			
Preparation Method			SM5220D	SM5220D			
Date Analyzed			09/15/2015	09/15/2015			
Matrix			Aqueous	Aqueous			
Units			mg/L	mg/L			
Dilution Factor			1	1			
Analytes	**MDL**	**PQL**	**Results**	**Results**			
Chemical Oxygen Demand	5.0	10.0	ND	54.0			

QUALITY CONTROL REPORT

QC Batch No: 091515-1; Dup or Spiked Sample: 78246.01; LCS: Clean Water; QC Prepared: 09/15/2015; QC Analyzed: 09/15/2015; Units: mg/L

Analytes	Sample Result	MS Concen	MS Recov	MS % REC	MS DUP Concen	MS DUP Recov	MS DUP % REC	RPD %	MS/MSD % Limit	MS RPD % Limit
Chemical Oxygen Demand	129	100	220	91.2	100	221	92.4	1.3	80-120	<15

QC Batch No: 091515-1; Dup or Spiked Sample: 78246.01; LCS: Clean Water; QC Prepared: 09/15/2015; QC Analyzed: 09/15/2015; Units: mg/L

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS DUP Concen	LCS DUP Recov	LCS DUP % REC	LCS RPD % REC	LCS/LCSD % Limit	LCS RPD % Limit	
Chemical Oxygen Demand	200	180	90.0	200	182	91.0	1.1	80-120	<15	

Exhibit 26. *Page 8 of 8.* Analytical storm water monitoring data collected at the Northwest Discharge Point at the Facility on September 15, 2015.